

Exhibit K2

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1 ***** C O N F I D E N T I A L *****
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK
4 - - -
5 EASTERN PROFIT CORPORATION,)
6 LIMITED,)
7 Plaintiff/Counterclaim Defendant,)
8 v.)
9 STRATEGIC VISION US, LLC,)
10 Defendant/Counterclaim Plaintiff.)

Case No.
18-cv-2185
(JGK)

11
12
13 DEPOSITION OF
14 LIANCHAO HAN
15 WASHINGTON, D.C.
16 AUGUST 28, 2019

17
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21 REPORTED BY: CATHERINE B. CRUMP
22 FILE NO. AD07997

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<p>1 Q. After you came to the U.S., maybe if you 09:19</p> <p>2 just could walk us through your career since you've 09:19</p> <p>3 been here. 09:19</p> <p>4 A. I went to a year of law school and I 09:19</p> <p>5 didn't quite -- I finished a program, but when the 09:19</p> <p>6 Tieneman Square massacre occurred and I become a 09:19</p> <p>7 student leader in this country, we organized protests 09:20</p> <p>8 against China's crackdown, and about 300 universities 09:20</p> <p>9 in this country, the Chinese student scholars formed 09:20</p> <p>10 a group that elected me as their first vice 09:20</p> <p>11 president. So we carried out the pro-democracy 09:20</p> <p>12 protest of, you know, Chinese students in this 09:20</p> <p>13 country and, also, we prepared ourself for to 09:20</p> <p>14 practice democracy and to learn how democracy works 09:20</p> <p>15 here and, meanwhile, we lobby U.S. Congress, U.S. 09:20</p> <p>16 Government, for a tougher human rights policy against 09:20</p> <p>17 China. 09:21</p> <p>18 So after, I did that work in Washington, D.C. 09:21</p> <p>19 for about a year and I worked in the U.S. Senate for 09:21</p> <p>20 about 12 years. I worked for three different 09:21</p> <p>21 Senators, served as a staff attorney, staff 09:21</p> <p>22 legislative counsel, and policy director. After 09:21</p> <p style="text-align: right;">Page 10</p>	<p>1 that you are a speaker and writer about U.S.-Chinese 09:23</p> <p>2 relations? 09:23</p> <p>3 A. Correct. 09:23</p> <p>4 Q. And you follow domestic politics in 09:23</p> <p>5 China as well? 09:23</p> <p>6 A. Correct. 09:23</p> <p>7 Q. If I were to ask you what Chairman -- 09:23</p> <p>8 well, let me back up for a second. 09:23</p> <p>9 Who is the president of China? 09:23</p> <p>10 A. Xi Jinping. 09:23</p> <p>11 Q. Is he also the chairman of the Chinese 09:23</p> <p>12 Communist Party? 09:23</p> <p>13 A. Yes. 09:23</p> <p>14 Q. Have you heard of a program of his 09:23</p> <p>15 called China Dream? 09:23</p> <p>16 A. Yes. 09:23</p> <p>17 Q. What is that? 09:23</p> <p>18 A. It is his idea. It's rhetoric about 09:23</p> <p>19 rejuvenating the nationalism of China. That's 09:23</p> <p>20 basically what it is. 09:23</p> <p>21 Q. Okay. And what does rejuvenating of the 09:23</p> <p>22 nationalism of China entail, more specifically? 09:24</p> <p style="text-align: right;">Page 12</p>
<p>1 that, I went back to finish my Ph.D., and after 09:21</p> <p>2 Ph.D., I went back to community college to study 09:21</p> <p>3 science and went to John Hopkins to get another 09:21</p> <p>4 master's degree in biotechnology, and when Liu 09:21</p> <p>5 Xiaobo, we promoted Liu Xiaobo to get the Nobel Peace 09:21</p> <p>6 Prize, and after that, I feel that we want to 09:21</p> <p>7 organize to run Liu Xiaobo. 09:22</p> <p>8 So I joined a human rights group called 09:22</p> <p>9 Citizens for Initiative for China and I served as the 09:22</p> <p>10 vice president of the group until now. I'm still the 09:22</p> <p>11 vice president of the group. So we basically lobby 09:22</p> <p>12 Congress, educate American general public about China 09:22</p> <p>13 and about, you know, for improved democracy for human 09:22</p> <p>14 rights. 09:22</p> <p>15 Q. Now, is it true -- I mentioned earlier 09:22</p> <p>16 that you're an attorney. You're a patent attorney; 09:22</p> <p>17 is that right? 09:22</p> <p>18 A. Correct. 09:22</p> <p>19 Q. Do you have any patents? 09:22</p> <p>20 A. I didn't myself. I didn't get a chance 09:22</p> <p>21 to file. 09:22</p> <p>22 Q. Okay. Okay. Is it also fair to say 09:22</p> <p style="text-align: right;">Page 11</p>	<p>1 A. More specifically -- 09:24</p> <p>2 MR. GAVENMAN: Objection to form. 09:24</p> <p>3 THE WITNESS: Huh? 09:24</p> <p>4 MR. GAVENMAN: I said objection to form. 09:24</p> <p>5 THE WITNESS: It's, basically, you know, make 09:24</p> <p>6 China the greatest country in the world. 09:24</p> <p>7 BY MR. GREIM: 09:24</p> <p>8 Q. Does that entail competition with the 09:24</p> <p>9 United States? 09:24</p> <p>10 A. Absolutely. 09:24</p> <p>11 Q. Does it involve undermining United 09:24</p> <p>12 States' interests? 09:24</p> <p>13 A. Of course. 09:24</p> <p>14 Q. Now, I take it, based on the background 09:24</p> <p>15 that you've just given us, that one of your goals is 09:24</p> <p>16 not to advance President Xi's goals. Am I right 09:24</p> <p>17 about that? 09:24</p> <p>18 MR. GREIM: Object to the form. 09:24</p> <p>19 THE WITNESS: Yes. 09:24</p> <p>20 MR. GREIM: Okay. Brief interlude: I want 09:25</p> <p>21 to mark as Exhibit 1 a production I received from 09:25</p> <p>22 your counsel in the wee hours. 09:25</p> <p style="text-align: right;">Page 13</p>

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1	[Han Exhibit No. 1 was	09:25	1	A. No.	09:27
2	marked for identification.]	09:25	2	Q. No. Why did you set your --	09:27
3	BY MR. GREIM:	09:25	3	A. I was searching for all the text	09:27
4	Q. I'll show you what's been marked as Han	09:25	4	messages and I noticed my Signal with Mike and French	09:27
5	Exhibit 1, and you'll see it starts off with a letter	09:25	5	is not set correctly. Sometimes, you know, it	09:27
6	from your attorney, Mr. Gavenman, that takes up the	09:25	6	changes. So I set it to 10 seconds.	09:27
7	first two pages and then there are a total of four	09:25	7	Q. What was it set to before 10 seconds?	09:27
8	Bates-labeled pages. Do you see that?	09:25	8	A. Before, I set it usually automatically	09:27
9	A. Yeah.	09:25	9	just erase it after read.	09:28
10	Q. Are those four pages the documents that	09:25	10	Q. Did you have any communications with Mr.	09:28
11	you gave to your attorney to produce to me?	09:25	11	Guo that you did not produce?	09:28
12	A. Yes.	09:25	12	A. No. With Mr. Guo, we don't use Signal.	09:28
13	Q. And the redaction, I take it, is just	09:25	13	Q. What do you use to communicate with Mr.	09:28
14	your communication with your counsel about what is	09:26	14	Guo?	09:28
15	below; is that right?	09:26	15	A. With What's App. WhatsApp, I also	09:28
16	A. Yes.	09:26	16	automatically to delete it whenever I read the	09:28
17	Q. Okay. Now, this morning, you also	09:26	17	message. Can I add?	09:28
18	produced a folder of hard copy documents; is that	09:26	18	MR. GAVENMAN: Sure.	09:28
19	right?	09:26	19	BY MR. GREIM:	09:29
20	A. Yes.	09:26	20	Q. Sure.	09:29
21	Q. Okay. We are looking at those and we'll	09:26	21	A. For this particular project, at the very	09:29
22	cover those later after we have a chance for a break.	09:26	22	beginning, we all agreed we're not -- everything has	09:29
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1	Okay?	09:26	1	to be in person, face-to-face meeting, no digital	09:29
2	A. Okay.	09:26	2	transmission of any sort of documents.	09:29
3	Q. I want to ask you do you have -- I have	09:26	3	Q. And why was that?	09:29
4	mentioned to your counsel the other day that I	09:26	4	A. Because everybody agreed to keep secret.	09:29
5	thought you may have text messages. Did you search	09:26	5	So we don't communicate on the digital platform	09:29
6	for and find any text messages or Signal messages	09:26	6	whatsoever.	09:29
7	with either Ms. Wallop or Mr. Waller?	09:26	7	Q. However, do you recall that, in fact,	09:29
8	A. All the messages are deleted. It said	09:26	8	some text communications did occur between you and	09:29
9	automatically deleted. I don't have any.	09:26	9	Ms. Wallop and Mr. Waller?	09:29
10	Q. Now, I will represent to you that when	09:26	10	A. I don't remember.	09:29
11	you use Signal and you change the settings on	09:27	11	Q. Okay.	09:29
12	there --	09:27	12	A. If there is, it must be very vague. I	09:29
13	A. Correct.	09:27	13	don't think we discussed that directly.	09:29
14	Q. -- it tells everybody else your	09:27	14	Q. Specifically, have you had	09:30
15	contacts.	09:27	15	communications with Ms. -- well, let me back up.	09:30
16	A. Yes.	09:27	16	Have you had communications with Mr. Guo about	09:30
17	Q. And so, yesterday, I believe we saw a	09:27	17	this case?	09:30
18	notice that you had changed the settings to 10-second	09:27	18	A. Let me think about this.	09:30
19	delete. Now, is that correct? Did you do that?	09:27	19	He called me on WhatsApp, blamed Mike and	09:30
20	A. That's correct.	09:27	20	French as a fraud, cheated him, and there was one	09:30
21	Q. But your testimony -- well, let me ask	09:27	21	situation, one time, that his supporters started	09:30
22	you. That's not what deleted the messages, is it?	09:27	22	about getting ready to attack me personally because I	09:31
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1	introduced Mike and French to Miles. Miles feel like	09:31	1	platform.	09:34
2	he is cheated by them. So when I learned the	09:31	2	Q. Have you received any sort of threats	09:34
3	supporters are about to attack me personally, I sent	09:31	3	from Yvette Wang or Mr. Podhaskie, sitting here today	09:35
4	him a message and I said how can you, you know, let	09:31	4	on behalf of Golden Spring?	09:35
5	your supporters do this to me.	09:31	5	A. No.	09:35
6	So he called me back and discussed and we	09:31	6	MR. GRENDI: Objection to form.	09:35
7	argued, you know, for quite a while and then, you	09:31	7	BY MR. GREIM:	09:35
8	know, just ended that. He kept asking me who gave	09:31	8	Q. Let me ask you have you had any	09:35
9	you that information, who tell you that my supporters	09:31	9	communications with Mr. Podhaskie here before today?	09:35
10	are going to attack you personally. I said I won't	09:31	10	A. I did.	09:35
11	be able to tell you that, and he pressured me many,	09:32	11	Q. What were those communications?	09:35
12	many times. I refused to tell him.	09:32	12	A. Mostly focused on the case against Clark	09:35
13	So when it ended, that's the only time we	09:32	13	Hill. He asked me -- he's bothering me, actually,	09:35
14	discussed this, and a few times when I was in his	09:32	14	about, you know, the case and I have been giving my	09:35
15	office, he mentioned about it as well, but we	09:32	15	accounts five, six times to different lawyers. I	09:36
16	obviously have different views about our perception.	09:32	16	just got really tired of that. He pressured me for	09:36
17	Q. The longer discussion that you just	09:32	17	giving more. So that's why we were back and forth	09:36
18	testified to --	09:32	18	about it.	09:36
19	A. Yeah.	09:32	19	Q. I'm sorry. What was the Clark Hill	09:36
20	Q. -- was this after the lawsuit was filed?	09:32	20	case?	09:36
21	A. I don't know when this lawsuit was	09:32	21	A. Clark Hill case is Miles is suing them,	09:36
22	filed. So I have no idea if it was before or after.	09:32	22	is about maybe suing them for his political asylum,	09:36
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1	Q. Okay. Was it after the -- do you	09:32	1	and Clark Hill was representing him originally to do	09:36
2	recall, at some point, there was a letter terminating	09:32	2	the political asylum case and then right after, you	09:36
3	the contract from the Foley, Hogue law firm?	09:32	3	know, they file the application, the Chinese cyber	09:36
4	A. I didn't.	09:32	4	attacked, basically hijacked the entire firm and	09:36
5	Q. No? Do you recall if it was soon after	09:32	5	forced the Clark Hill to drop representation of him.	09:36
6	the work on the project started -- stopped?	09:33	6	As a result, Miles' application was exposed	09:37
7	A. That, I don't specifically remember. I	09:33	7	because Chinese hackers got the information and	09:37
8	think it must be a while after it stopped.	09:33	8	posted online, which is damaging to his personal	09:37
9	Q. Did Mr. Guo deny to you that he had	09:33	9	safety.	09:37
10	supporters who were going to attack you?	09:33	10	Q. Now let me ask you when were your	09:37
11	A. He didn't deny it.	09:33	11	interactions with Mr. Podhaskie about that matter?	09:37
12	Q. What do you mean when you say that	09:33	12	A. I would say I don't know when he was	09:37
13	supporters of Guo were going to personally attack	09:33	13	hired. I think it's back and forth probably through	09:37
14	you?	09:33	14	maybe over half a year, maybe eight months. I don't	09:37
15	A. At one point, I think Miles made a video	09:33	15	remember specifically.	09:37
16	to see. I assured him four times a hundred percent	09:34	16	Q. Half a year or eight months ago?	09:37
17	Mike and French are going to deliver what he's asking	09:34	17	A. Yes. Eight months ago, maybe a year	09:37
18	for, which I did, and then the supporters say, you	09:34	18	ago.	09:37
19	know, I must be in the scam to cheat him, so asking	09:34	19	Q. And we're about to move on. I just want	09:37
20	him when should we attack Lianchao Han.	09:34	20	to make sure I understand this.	09:38
21	Q. Were these supporters online supporters?	09:34	21	A. Yeah.	09:38
22	A. I think they were through a private chat	09:34	22	Q. How is it that you would have	09:38
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1	information about the Clark Hill matter? What was	09:38	1	colleagues that agree with me, we try to persuade him	09:40
2	your involvement?	09:38	2	not to pursue it, and that was the earliest	09:40
3	A. I was helping Miles for his asylum case.	09:38	3	discussion. Of course, he won't listen to me and I	09:40
4	Q. So then you had interaction with the	09:38	4	tried a few more times this, and then I don't think	09:41
5	Clark Hill lawyers?	09:38	5	he was -- you know, there's no way he agreed with me.	09:41
6	A. Correct.	09:38	6	So that was that.	09:41
7	Q. How do you know that Chinese hackers did	09:38	7	Then, later, I think we discussed. He didn't	09:41
8	hack the Clark Hill law firm?	09:38	8	discuss specifically about the case at all. He kept	09:41
9	A. Clark Hill told me.	09:38	9	saying French and Mike are frauds, cheated him, which	09:41
10	Q. Do you believe them?	09:38	10	we always have a different view on that. I disagree	09:41
11	A. Of course.	09:38	11	with him on that. So we argued back and forth. So	09:41
12	Q. Okay. Let me ask about -- you mentioned	09:38	12	that pretty much was our main conversation about the	09:41
13	a couple of different conversations with Mr. Guo	09:39	13	case, whether they're cheating him or not.	09:41
14	about this case.	09:39	14	Q. Why do you disagree?	09:41
15	A. Yes.	09:39	15	A. Because I think everybody comes in with	09:41
16	Q. We talked about the longer conversation	09:39	16	a good intention at the beginning.	09:42
17	and then you said you met with him a few more times	09:39	17	Q. Who are the colleagues of Mr. Guo's that	09:42
18	in the office.	09:39	18	agreed with your position early on?	09:42
19	A. Yes.	09:39	19	MR. GAVENMAN: Objection to form.	09:42
20	Q. Now, whose office was that?	09:39	20	Go ahead.	09:42
21	A. Miles' office.	09:39	21	THE WITNESS: At the meeting was his --	09:42
22	Q. Where is that office?	09:39	22	Victor Cedar and William Yu. Williams, he's a	09:42
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1	A. I think at -- what is that? 62 -- 64	09:39	1	manager, I think.	09:42
2	Street of New York.	09:39	2	BY MR. GREIM:	09:42
3	Q. 64th Street on the upper east side?	09:39	3	Q. Is this William Je, J-E?	09:42
4	A. Yeah.	09:39	4	A. J-E? I think Yu. Right? No.	09:42
5	Q. Are those also the Golden Spring	09:39	5	I don't remember his last name, but he was --	09:42
6	offices?	09:39	6	he was -- I remember he was at the meeting. He also	09:43
7	A. That, I don't know.	09:39	7	agreed with me not to pursue this case, because we --	09:43
8	Q. When did those meetings occur, to the	09:39	8	yeah. I predict what's going to happen exactly like	09:43
9	best of your recollection?	09:39	9	what's happening right now.	09:43
10	A. That's hard to know. I think maybe two	09:39	10	MR. GRENDI: I'm sorry. What was the name of	09:43
11	months ago, there was one, or three months ago and	09:39	11	the first individual?	09:43
12	then early -- I have been there maybe three, four	09:40	12	THE WITNESS: Victor.	09:43
13	times.	09:40	13	MR. GRENDI: Sorry. I was asking the court	09:43
14	Q. Does Mr. Guo ask for your advice about	09:40	14	reporter. I apologize.	09:43
15	this case?	09:40	15	MR. GREIM: That's okay. I was going to ask	09:43
16	A. No.	09:40	16	anyway.	09:43
17	Q. What did you discuss with him about the	09:40	17	MR. GRENDI: Okay. Fair enough.	09:43
18	case? Let's start with the earliest meeting that you	09:40	18	BY MR. GREIM:	09:43
19	can remember.	09:40	19	Q. Victor, what was his last name?	09:43
20	A. I think at the beginning, I strongly	09:40	20	A. Cedar. Cedar. Correct?	09:43
21	advised when he mentioned he's going to sue French	09:40	21	Q. Was he at Foley, Hogue?	09:43
22	and Mike, I opposed the idea. I also got his	09:40	22	A. No. He is a solo practitioner.	09:43
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1	Q. Could you spell his last name?	09:43	1	Vision would likely counterclaim against him?	09:46
2	A. C-E-D-A-R. I could be wrong. I always	09:43	2	A. Yes. Not specifically counterclaim. I	09:46
3	just call his first name.	09:43	3	have to take that back. I think they will create	09:46
4	Q. What did you understand that William's	09:43	4	difficult situation that will jeopardize your	09:46
5	position was with Mr. Guo?	09:44	5	political asylum. It's not worth it.	09:47
6	A. I think he manages his financial assets.	09:44	6	Q. Did you ever speak with Yvette Wang, who	09:47
7	Q. Do you know if he is the director of a	09:44	7	is sitting here at the table, about the lawsuit?	09:47
8	company called ACA?	09:44	8	A. No.	09:47
9	A. That, I didn't know.	09:44	9	Q. Do you know what role she plays for Mr.	09:47
10	Q. Have you heard of that company, ACA or	09:44	10	Guo?	09:47
11	ACA Capital Group Limited?	09:44	11	MR. GRENDI: Object to the form.	09:47
12	A. I'm not sure, but one time, I think -- I	09:44	12	THE WITNESS: Roughly.	09:47
13	don't know which one. There's a trust fund or	09:44	13	BY MR. GREIM:	09:47
14	something that French tried to buy real estate for	09:44	14	Q. What is that?	09:47
15	Miles that needed a letter of credit. I think that	09:44	15	A. She's been his longtime assistant. He	09:47
16	company provided it. I don't know which company	09:44	16	managed -- she managed the office and she was	09:47
17	provided it.	09:44	17	originally excluded from this discussion, this	09:47
18	I don't remember that, but I think -- yeah.	09:44	18	project with Mike and French, and later, she was the	09:47
19	Maybe that.	09:45	19	one who signed the contract, finished the	09:48
20	Q. This William Yu --	09:45	20	negotiation, signed the contract with them, managed	09:48
21	A. Yeah.	09:45	21	the project until, in the end, Miles asked -- took	09:48
22	Q. -- where does he live?	09:45	22	her out, put me back in.	09:48
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1	A. I don't know. He seems to travel back	09:45	1	That's all I know. I don't know specifically	09:48
2	and forth, Hong Kong, London, and New York.	09:45	2	what she does, but that's just based on my	09:48
3	Q. Does he have a role with McQuary Capital	09:45	3	observation.	09:48
4	Group? Does that sound familiar?	09:45	4	Q. Well, have you heard of an entity called	09:48
5	A. I don't remember. Is that Australian?	09:45	5	Golden Spring New York or Golden Spring Hong Kong?	09:48
6	Q. It is.	09:45	6	A. I heard about it, yeah.	09:48
7	A. Then he used to be involved before Miles	09:45	7	MR. GRENDI: Object to the form.	09:48
8	hired him.	09:45	8	BY MR. GREIM:	09:48
9	Q. When the last time you saw William?	09:45	9	Q. Do you know whether Ms. Wang has a role	09:48
10	A. Well, that may be a year ago or -- I	09:45	10	with either of the Golden Spring entities?	09:48
11	don't remember. Maybe eight months ago.	09:46	11	MR. GRENDI: Objection to the form.	09:48
12	Q. I want to go back now. I just want to	09:46	12	THE WITNESS: I didn't.	09:48
13	make sure we cover this. Is there anything else that	09:46	13	BY MR. GREIM:	09:48
14	you discussed with Mr. Guo in these meetings in his	09:46	14	Q. Why was it that Ms. Wang -- well, let me	09:48
15	office --	09:46	15	back up.	09:48
16	A. Yeah.	09:46	16	Why do you say Ms. Wang was originally	09:48
17	Q. -- about the case that we haven't	09:46	17	excluded from the discussion?	09:49
18	covered yet?	09:46	18	A. I didn't know. I think, later -- I	09:49
19	A. There may be something, but I don't	09:46	19	forgot if he said in the meeting or he said to French	09:49
20	remember, but mainly, I remember the major picture,	09:46	20	and Mike later, but the reason was Miles didn't trust	09:49
21	big picture, thing is just this.	09:46	21	her and she has many relatives that is within the	09:49
22	Q. Did you tell Mr. Guo that Strategic	09:46	22	system.	09:49
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<p>1 Q. What do you mean, "within the system"? 09:49</p> <p>2 A. With the communist, work for the Chinese 09:49</p> <p>3 Government. I didn't know the source, but I just 09:49</p> <p>4 didn't remember if he said that in the meeting or 09:49</p> <p>5 later, but that's my impression. 09:49</p> <p>6 Q. Well, let me back up for a second. When 09:49</p> <p>7 did you first remember meeting her? 09:49</p> <p>8 A. Meeting Yvette? 09:50</p> <p>9 Q. Um-hum. 09:50</p> <p>10 A. I think maybe two years ago. 09:50</p> <p>11 Q. Okay. So it would be late summer of 09:50</p> <p>12 2017? 09:50</p> <p>13 A. It will be August or September. August, 09:50</p> <p>14 most likely, yeah, August. 09:50</p> <p>15 Q. How are you able to remember that time? 09:50</p> <p>16 A. That was political asylum. Miles tried 09:50</p> <p>17 to -- that's why we were introduced to him and he did 09:50</p> <p>18 help him with his political asylum. Yeah. 09:50</p> <p>19 Q. What I should have asked you in the very 09:50</p> <p>20 beginning was when did you first meet Mr. Guo? 09:50</p> <p>21 A. I think it's either July or August, 09:50</p> <p>22 early August or, you know, late July of 2017. 09:50</p> <p style="text-align: right;">Page 30</p>	<p>1 him with his various efforts to obtain political 09:52</p> <p>2 asylum from that point forward? 09:52</p> <p>3 A. Correct. 09:52</p> <p>4 Q. What was your initial impression of Mr. 09:52</p> <p>5 Guo? 09:52</p> <p>6 A. I think he's a genuine warm person. He 09:52</p> <p>7 has a deep knowledge of how the communist system 09:53</p> <p>8 works and he has a reason to expose the high-ranking 09:53</p> <p>9 government officials that are corrupt and, also, he 09:53</p> <p>10 has many defects of the people from the communist 09:53</p> <p>11 system. 09:53</p> <p>12 Q. What do you mean by that? 09:53</p> <p>13 A. Like -- 09:53</p> <p>14 MR. GRENDI: Objection to form. 09:53</p> <p>15 THE WITNESS: He probably won't tell you 09:53</p> <p>16 exactly what he thinks. Sometimes he exaggerates 09:53</p> <p>17 what he's done and stuff like that. 09:53</p> <p>18 BY MR. GREIM: 09:53</p> <p>19 Q. So you met Ms. Wang, then, within about 09:53</p> <p>20 a month or so of having met Mr. Guo himself? 09:54</p> <p>21 A. Correct. 09:54</p> <p>22 Q. Did your impression of Mr. Guo change 09:54</p> <p style="text-align: right;">Page 32</p>
<p>1 Q. And who introduced you? 09:50</p> <p>2 A. His name is Jonathan Ho. The Chinese 09:51</p> <p>3 name is Chen Jun. 09:51</p> <p>4 Q. Is that the last name, H-O? 09:51</p> <p>5 A. Correct. 09:51</p> <p>6 Q. Jonathan Ho. Who is Jonathan Ho? 09:51</p> <p>7 A. He is a longtime friend of mine. He 09:51</p> <p>8 also used to be an activist, pro-democracy activist. 09:51</p> <p>9 He's a friend with the late Nobel Peace Prize winner 09:51</p> <p>10 Liu Xiaobo. 09:51</p> <p>11 Q. So why did Mr. Ho introduce you to Mr. 09:51</p> <p>12 Guo? 09:51</p> <p>13 MR. GRENDI: Objection, form. 09:51</p> <p>14 MR. GAVENMAN: Objection to form. 09:51</p> <p>15 THE WITNESS: I think, at the time, they were 09:52</p> <p>16 talking about the options, what to do, whether to 09:52</p> <p>17 seek political asylum or other form of protection, 09:52</p> <p>18 and he knows that, you know, I'm familiar with the 09:52</p> <p>19 American legal system. So he brought me to discuss 09:52</p> <p>20 those options with Miles. 09:52</p> <p>21 BY MR. GREIM: 09:52</p> <p>22 Q. And is it fair to say that you assisted 09:52</p> <p style="text-align: right;">Page 31</p>	<p>1 over time? 09:54</p> <p>2 A. No. 09:54</p> <p>3 Q. Do you consider yourself to be a 09:54</p> <p>4 personal friend of Mr. Guo? 09:54</p> <p>5 A. That's a very -- 09:54</p> <p>6 Q. Sorry. 09:54</p> <p>7 A. -- difficult question. I think I 09:54</p> <p>8 maintain a personal relationship with him and, also, 09:54</p> <p>9 politically, I support his effort and I also have a 09:55</p> <p>10 lot of reservation about him. 09:55</p> <p>11 Q. What are those reservations? 09:55</p> <p>12 A. He just brings troubles to me. You 09:55</p> <p>13 know, I live a very simple straightforward life. 09:55</p> <p>14 This is my first deposition, first -- you know, this, 09:55</p> <p>15 it's not fun. 09:55</p> <p>16 My focus is the big picture, how to change 09:55</p> <p>17 China, how to promote democracy. I don't want to 09:55</p> <p>18 sign on to derail from that goal. This definitely is 09:55</p> <p>19 troublesome to me. 09:55</p> <p>20 Q. Do you have any concern about whether 09:55</p> <p>21 Guo is fully committed to overturning the Chinese 09:56</p> <p>22 communist system? 09:56</p> <p style="text-align: right;">Page 33</p>

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1	A. Well, I think he's fully committed. At	09:56	1	MR. GRENDI: Object to the form.	09:58
2	the same time, he also has his relatives, his	09:56	2	THE WITNESS: I didn't know.	09:58
3	employees to be considered and his assets, although,	09:56	3	BY MR. GREIM:	09:58
4	all of it has been confiscated. So I understand his	09:56	4	Q. Do you know whether he is negotiating	09:58
5	position.	09:56	5	with Chinese officials even today?	09:59
6	Q. And would it surprise you if Mr. Guo,	09:56	6	A. I didn't know that either.	09:59
7	for example, vacillates in wanting regime change	09:56	7	Q. Let's shift gears for a moment here and	09:59
8	versus something less than that?	09:56	8	-- well, before we move on. After you met Guo, Mr.	09:59
9	MR. GRENDI: Object to the form.	09:57	9	Guo --	09:59
10	MR. GAVENMAN: Object to the form.	09:57	10	A. Yeah.	09:59
11	THE WITNESS: Can you rephrase that?	09:57	11	Q. -- did he introduce you to others	09:59
12	BY MR. GREIM:	09:57	12	besides Yvette Wang over the next month or two?	09:59
13	Q. Sure. Sure. Would it surprise you that	09:57	13	A. I met all his families, family members,	09:59
14	Mr. Guo tries to bargain with Chinese officials?	09:57	14	through him. I met with Tony Blair. I met -- who	09:59
15	MR. GRENDI: Object to the form.	09:57	15	else? There were several other people that's	09:59
16	MR. GAVENMAN: Objection to form.	09:57	16	significant maybe.	09:59
17	THE WITNESS: Frankly, I think it's possible,	09:57	17	Q. Did he introduce you to someone named	10:00
18	but it's unlikely, highly unlikely. It's too late	09:57	18	Hansheng Wang?	10:00
19	for that.	09:57	19	A. He never introduced me to Hansheng Wang.	10:00
20	BY MR. GREIM:	09:57	20	Hansheng Wang, I know used to be his staff. I got to	10:00
21	Q. What do you mean by it's too late for	09:57	21	know him in that capacity.	10:00
22	that?	09:57	22	Q. What does Hansheng Wang do for Mr. Guo?	10:00
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1	MR. GRENDI: Object to the form.	09:57	1	MR. GRENDI: Object to form.	10:00
2	MR. GAVENMAN: Objection to form.	09:57	2	MR. GAVENMAN: Object to the form.	10:00
3	THE WITNESS: He's already put himself in the	09:57	3	THE WITNESS: If I saw him, he do -- he does	10:00
4	position that he is the number one enemy of the	09:57	4	lots of different things, bodyguard, security. He	10:00
5	regime.	09:57	5	also cooks. What else he does? Run errands, book	10:00
6	BY MR. GREIM:	09:57	6	hotel rooms, you know.	10:00
7	Q. When did he cross that line?	09:57	7	BY MR. GREIM:	10:00
8	MR. GAVENMAN: Objection to form.	09:58	8	Q. Does he run any companies?	10:00
9	MR. GRENDI: Objection to the form.	09:58	9	A. I have no knowledge.	10:00
10	THE WITNESS: I don't know for sure. My	09:58	10	Q. Do you know if he's a principal of	10:00
11	speculation -- can I speculate?	09:58	11	Eastern Profit?	10:01
12	MR. GAVENMAN: You shouldn't speculate. Only	09:58	12	A. I didn't know that.	10:01
13	speak to things that you know.	09:58	13	Q. Does he actually live in Mr. Guo's	10:01
14	THE WITNESS: All right. But I think -- can	09:58	14	apartment?	10:01
15	I just say, more likely, after he turned the MSS	09:58	15	A. I didn't know that either.	10:01
16	Secretary of Discipline into FBI, they busted them at	09:58	16	MR. GAVENMAN: Objection to form.	10:01
17	La Guardia Airport and I think that's where he	09:58	17	MR. GRENDI: Object to the form.	10:01
18	crossed the line.	09:58	18	THE WITNESS: I saw him all the time there,	10:01
19	BY MR. GREIM:	09:58	19	but I didn't know he lived there.	10:01
20	Q. Do you know whether he attempted to	09:58	20	BY MR. GREIM:	10:01
21	negotiate with Chinese officials even after that	09:58	21	Q. Which Guo family members were you	10:01
22	point?	09:58	22	introduced to?	10:01
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<p>1 A. I met his son, Wu Chun. I met his 10:01</p> <p>2 daughter, Wo Mei, his wife, Yu Chen Su. 10:01</p> <p>3 Q. We'll get some of these names here on 10:01</p> <p>4 the break. 10:01</p> <p>5 A. Okay. 10:01</p> <p>6 MR. GRENDI: Eddie, I'm just going to jump in 10:01</p> <p>7 here. Are we going to get on topic here? We're 10:02</p> <p>8 talking about -- 10:02</p> <p>9 MR. GREIM: We are on topic. 10:02</p> <p>10 MR. GRENDI: Talking about Mr. Guo's family 10:02</p> <p>11 and who Mr. Lianchao has met, this has nothing to do 10:02</p> <p>12 with this dispute. 10:02</p> <p>13 MR. GREIM: Please don't disrupt the 10:02</p> <p>14 deposition. 10:02</p> <p>15 MR. GRENDI: I'm not disrupting the 10:02</p> <p>16 deposition. I want to move it along and have it on 10:02</p> <p>17 topic. You know, we're discussing irrelevant stuff 10:02</p> <p>18 right now, but please continue. 10:02</p> <p>19 BY MR. GREIM: 10:02</p> <p>20 Q. When was the first time that you met 10:02</p> <p>21 French Wallop? 10:02</p> <p>22 A. Let's see. I would say September -- 10:02</p> <p style="text-align: right;">Page 38</p>	<p>1 Guo? 10:04</p> <p>2 MR. GRENDI: Object to the form. 10:04</p> <p>3 THE WITNESS: I didn't approach them. 10:04</p> <p>4 BY MR. GREIM: 10:04</p> <p>5 Q. Did Ms. Wallop approach you? 10:04</p> <p>6 A. No. That's not the case. They were 10:04</p> <p>7 introduced through Bill Gertz. Bill Gertz called me 10:04</p> <p>8 and said can you set up meeting with Miles; I want to 10:04</p> <p>9 introduce Mike and French, Strategic Vision, to help 10:04</p> <p>10 Miles. So I set up meeting and we were introduced 10:04</p> <p>11 that way. 10:04</p> <p>12 Q. Okay. Did you already know Mr. Gertz? 10:04</p> <p>13 A. Yes. 10:04</p> <p>14 Q. How long have you known him? 10:05</p> <p>15 A. Thirty years. 10:05</p> <p>16 Q. Now, did Mr. Gertz, then, already seem 10:05</p> <p>17 to know or already seem to have a specific project in 10:05</p> <p>18 mind for Mr. Guo? 10:05</p> <p>19 MR. GRENDI: Objection. 10:05</p> <p>20 MR. GAVENMAN: Object to the form. 10:05</p> <p>21 THE WITNESS: Yes. 10:05</p> <p>22 BY MR. GREIM: 10:05</p> <p style="text-align: right;">Page 40</p>
<p>1 October or September of 2017. 10:02</p> <p>2 Q. Did you know her beforehand? 10:02</p> <p>3 A. I didn't know her. I know her -- I 10:02</p> <p>4 worked with her husband many years ago. So I had a 10:02</p> <p>5 very good relationship with his office. Naturally, I 10:03</p> <p>6 know of her. I didn't met her. 10:03</p> <p>7 Q. Was this Senator Malcolm Wallop? 10:03</p> <p>8 A. Correct. 10:03</p> <p>9 Q. What about Mr. Waller? 10:03</p> <p>10 A. That was the same time I met with 10:03</p> <p>11 French. 10:03</p> <p>12 Q. Did she you know of Mr. Waller before 10:03</p> <p>13 the fall of 2017? 10:03</p> <p>14 A. No. 10:03</p> <p>15 Q. Let's talk a little bit about the 10:03</p> <p>16 research project that's at issue here. How is it 10:03</p> <p>17 that -- well, let me ask you this: Did there come a 10:03</p> <p>18 time that you approached French Wallop about possible 10:03</p> <p>19 work for Mr. Guo? 10:04</p> <p>20 A. Say that again. 10:04</p> <p>21 Q. Did there come a time when you 10:04</p> <p>22 approached Ms. Wallop about possible work for Mr. 10:04</p> <p style="text-align: right;">Page 39</p>	<p>1 Q. What was that? 10:05</p> <p>2 A. I think that was the original proposal 10:05</p> <p>3 French and Mike brought with them or maybe they first 10:05</p> <p>4 gave it to me and I shared it with Miles to handle 10:05</p> <p>5 his communication, pretty much. 10:05</p> <p>6 Q. So when Mr. Gertz came to you -- 10:05</p> <p>7 A. Yes. 10:05</p> <p>8 Q. -- and asked you to set up this 10:05</p> <p>9 meeting -- 10:05</p> <p>10 A. Yes. 10:05</p> <p>11 Q. -- did you understand that he had 10:05</p> <p>12 already spoken to Ms. Wallop and Mr. Waller? 10:05</p> <p>13 A. Absolutely. 10:06</p> <p>14 MR. GRENDI: Objection. 10:06</p> <p>15 BY MR. GREIM: 10:06</p> <p>16 Q. At that time, let's say when -- let me 10:06</p> <p>17 strike that. 10:06</p> <p>18 When Mr. Gertz first contacted you about 10:06</p> <p>19 this -- 10:06</p> <p>20 A. Yeah. 10:06</p> <p>21 Q. -- were you already aware that Mr. Guo 10:06</p> <p>22 was looking for some type of research? 10:06</p> <p style="text-align: right;">Page 41</p>

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1	A. No.	10:06	1	but there was a huge leak of data that exposed lots	10:09
2	MR. GAVENMAN: Objection to form.	10:06	2	of Chinese Government officials' offshore companies.	10:09
3	MR. GRENDI: Objection to the form.	10:06	3	I looked into that.	10:09
4	THE WITNESS: Miles didn't even know what he	10:06	4	We did a lot of research through different	10:09
5	was looking for. He had -- this is not his idea	10:06	5	means and we submitted it the U.S. Government about	10:10
6	whatsoever.	10:06	6	those individuals, that corruption with a select few	10:10
7	BY MR. GREIM:	10:06	7	that specifically -- you know, based on the	10:10
8	Q. Why did you agree to set up a meeting	10:06	8	corruption and required the U.S. Government sanction	10:10
9	between Wallop and Waller and Guo?	10:07	9	them under the FCP Act.	10:10
10	A. I think French and Mike had very good	10:07	10	Q. And -- okay. And was that with the	10:10
11	experience in handling strategic communication. They	10:07	11	Hudson Institute?	10:10
12	have a good reputation in Washington, D.C., also	10:07	12	A. No. With the Citizen Power initiative	10:10
13	under the strong recommendation by Bill Gertz. I	10:07	13	and with the Hudson initiative.	10:10
14	also know Senator Wallop. So I, of course, I	10:07	14	Q. I see. So in the fall of 2017 -- and	10:10
15	naturally think they could do the job.	10:07	15	then we'll take a break here.	10:10
16	Q. Before this project came along --	10:07	16	A. Yeah.	10:10
17	A. Yeah.	10:07	17	Q. In the fall of 2017, had you discussed	10:10
18	Q. -- had you ever been involved with any	10:07	18	with Mr. Guo that he might be able to contribute to	10:10
19	sort of research project into individuals?	10:07	19	something like that, to that kind of an effort?	10:11
20	MR. GAVENMAN: Objection to form.	10:08	20	A. Yes, I did.	10:11
21	THE WITNESS: No.	10:08	21	Q. And was that before Mr. Gertz contacted	10:11
22	BY MR. GREIM:	10:08	22	you about Ms. Wallop and Mr. Waller?	10:11
Page 42			Page 44		
1	Q. Had you ever been involved with any sort	10:08	1	A. Yes.	10:11
2	of research project into the Chinese Communist Party?	10:08	2	Q. So do you know whether Mr. Guo was at	10:11
3	MR. GAVENMAN: Objection to form.	10:08	3	least considering some sort of research project into	10:11
4	THE WITNESS: Just personally on my -- what	10:08	4	the Chinese Communist Party members?	10:11
5	type of research? Can you rephrase that?	10:08	5	A. It's not --	10:11
6	BY MR. GREIM:	10:08	6	MR. GAVENMAN: Objection to form.	10:11
7	Q. Sure. Maybe a project where there would	10:08	7	MR. GRENDI: Objection to the form.	10:11
8	be an effort to find nonpublic information about	10:08	8	THE WITNESS: Yeah. It's not specific. This	10:11
9	Chinese Communist Party members.	10:08	9	idea, my point at the time when I communicated with	10:11
10	MR. GAVENMAN: Objection to form.	10:08	10	Miles, I said in order to have this whistle-blowing,	10:11
11	THE WITNESS: Not in -- we have done lots of	10:08	11	this disruptive momentum you made to continue -- they	10:11
12	-- I've done lots of research on the Communist Party	10:08	12	call it the whistle-blowing revolution to continue --	10:11
13	members, particularly on the corruption side. I	10:08	13	I told him you need very solid evidence to	10:11
14	worked with Hudson Institute. This Kleptocracy	10:08	14	sustainable expose Chinese communist high-ranking	10:11
15	Center, I helped them with the relationship, the	10:09	15	government officials.	10:12
16	mapping of Chinese high-ranking government officials,	10:09	16	So that was the principle. We never get into	10:12
17	their corruption, you know, potential corruption.	10:09	17	detail how to do it until Mike and French's proposal	10:12
18	I also worked on several other projects,	10:09	18	come over. I was the one -- originally, this project	10:12
19	tried to pinpoint the Chinese high-ranking government	10:09	19	basically is a communication, handling the	10:12
20	officials, the family corruption, and based on some	10:09	20	communication, P.R., not into the investigation. I	10:12
21	of the -- based on the international consortium, you	10:09	21	was the one who approached -- I explored this	10:12
22	know, there was a leak from Wikipedia for the source,	10:09	22	possibility with French and Mike first and they said	10:12
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1	they can do it and then I convinced Miles to move to	10:12	1	THE WITNESS: You mean through social media?	10:27
2	this direction. It's not from Miles. It's from me.	10:12	2	BY MR. GREIM:	10:27
3	MR. GREIM: Okay. I don't know that we've	10:12	3	Q. Through social media.	10:27
4	been going for quite an hour yet, but let's go ahead	10:12	4	A. Yes.	10:27
5	and take our first break, if that's okay.	10:13	5	Q. So you reviewed some of those items	10:27
6	THE WITNESS: All right.	10:13	6	yourself?	10:27
7	MR. GREIM: We'll take a -- let's go ahead	10:13	7	A. Usually, you know, his media videos are	10:27
8	and try to just make it five, if we can.	10:13	8	too long. I usually don't watch it unless there's a	10:28
9	VIDEOGRAPHER: Going off the record. The	10:13	9	specific issue I found interesting.	10:28
10	time is 10:15 a.m.	10:13	10	Q. Now, did you talk with Mr. Guo about his	10:28
11	[Recess.]	10:26	11	own background?	10:28
12	VIDEOGRAPHER: We are back on the record.	10:26	12	And this is -- we're going to limit it to, you	10:28
13	The time is now 10:28 a.m.	10:26	13	know, all your discussions with him up until the time	10:28
14	BY MR. GREIM:	10:26	14	you introduced Strategic Vision to Mr. Guo.	10:28
15	Q. Welcome back, Mr. Han.	10:26	15	MR. GREIM: Object to the form.	10:28
16	A. Yes.	10:26	16	MR. GAVENMAN: Object to form.	10:28
17	Q. Let's go again to the same timeframe	10:26	17	THE WITNESS: There are some discussions,	10:28
18	we've been talking about, sort of late summer, early	10:26	18	because I think that's also privileged because of	10:28
19	fall of 2017. At that time, is it fair to say that	10:26	19	related to his political asylum. I think it's better	10:28
20	your interactions with Mr. Guo were, number one,	10:26	20	not for me to talk about it.	10:28
21	about his asylum application --	10:26	21	BY MR. GREIM:	10:28
22	A. Correct.	10:26	22	Q. Did he retain you as counsel on the	10:28
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1	Q. -- and, number two, some general	10:26	1	political asylum matter?	10:29
2	discussions about what it would take for him to sort	10:26	2	A. Not as counsel, but as facilitator, you	10:29
3	of be a whistleblower about the Chinese Communist	10:26	3	know, sort of a legal assistant. We -- yeah.	10:29
4	Party?	10:26	4	Q. Okay. So I want to make sure I'm clear.	10:29
5	MR. GAVENMAN: Objection.	10:26	5	Do you believe you were acting as his attorney?	10:29
6	MR. GREIM: Object to the form.	10:26	6	A. I wasn't --	10:29
7	THE WITNESS: He was already a whistleblower	10:26	7	MR. GREIM: Object to form.	10:29
8	at the time. My suggestion was to sustain that	10:27	8	MR. GAVENMAN: Object to the form.	10:29
9	whistleblower.	10:27	9	[Interruption.]	10:29
10	BY MR. GREIM:	10:27	10	BY MR. GREIM:	10:29
11	Q. Now, by this point, had you done any	10:27	11	Q. Were you able to finish your answer?	10:29
12	research of your own into Mr. Guo's background?	10:27	12	A. Yes.	10:29
13	A. A little bit.	10:27	13	Q. Were you being paid by Guo at this time?	10:29
14	Q. Okay. What did you do to look into his	10:27	14	A. No.	10:29
15	background?	10:27	15	MR. GREIM: Object to the form.	10:29
16	A. Just online information.	10:27	16	BY MR. GREIM:	10:29
17	Q. So you read some of the articles that	10:27	17	Q. By the way, have you ever been paid by	10:29
18	had been written about him?	10:27	18	Mr. Guo or by one of the entities he controls?	10:29
19	A. Correct.	10:27	19	A. No.	10:30
20	Q. And by this point, had he begun posting	10:27	20	MR. GREIM: Objection.	10:30
21	things online himself?	10:27	21	MR. GAVENMAN: Objection to form.	10:30
22	MR. GREIM: Object to the form.	10:27	22	BY MR. GREIM:	10:30
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1	Q. Have you been paid by the Rule of Law	10:30	1	MR. GAVENMAN: Objection to form.	10:32
2	Foundation?	10:30	2	MR. GRENDI: Objection.	10:32
3	A. No.	10:30	3	THE WITNESS: A lot of that discussion, you	10:32
4	Q. Okay. Then here's what I'll do. I'm	10:30	4	know, this is all from the meeting.	10:32
5	not -- I don't believe a privilege will apply to	10:30	5	MR. GAVENMAN: So I'm going to instruct you	10:32
6	shield his disclosures to you about his past from	10:30	6	not to answer, attorney-client privilege.	10:32
7	discovery, but what I'm going to do is just simply	10:30	7	THE WITNESS: Yeah.	10:32
8	ask you about your knowledge. Okay?	10:30	8	BY MR. GREIM:	10:32
9	And what we'll try to do is not put it -- we	10:30	9	Q. Did Mr. Guo make representations to	10:32
10	will try not to ask about conversations that you had	10:30	10	French Wallop or Mike Waller about his past?	10:32
11	with him while his asylum counsel were present.	10:30	11	MR. GAVENMAN: Objection to form, foundation.	10:33
12	Okay?	10:30	12	THE WITNESS: During the meeting with them?	10:33
13	A. [Gestures.]	10:30	13	BY MR. GREIM:	10:33
14	Q. Okay.	10:30	14	Q. Yes.	10:33
15	MR. GAVENMAN: Let me caution you. To the	10:30	15	A. I didn't remember exactly what he said	10:33
16	extent you learned anything in the course of those	10:31	16	to them. I think that maybe there is some	10:33
17	discussions, you shouldn't disclose that either.	10:31	17	discussion.	10:33
18	THE WITNESS: Correct.	10:31	18	Q. Did Mr. Guo participate in the Tieneman	10:33
19	BY MR. GREIM:	10:31	19	Square protest?	10:33
20	Q. So did you understand that Mr. Guo	10:31	20	A. During the time of that meeting?	10:33
21	became a dissident during the Tieneman Square	10:31	21	MR. GAVENMAN: Asked and answered.	10:33
22	demonstrations and massacre?	10:31	22	MR. GRENDI: Objection.	10:33
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1	A. Say that again.	10:31	1	MR. GAVENMAN: We've established that there	10:33
2	Q. Well, let me ask you a different	10:31	2	is privilege attached to that answer. So I instruct	10:33
3	question, because that's -- did you understand that	10:31	3	you not to answer as well.	10:33
4	Mr. Guo participated in the Tieneman Square	10:31	4	BY MR. GREIM:	10:33
5	demonstrations and massacre?	10:31	5	Q. What do you remember about what Mr. Guo	10:33
6	MR. GRENDI: Object to the form.	10:31	6	said about himself to Ms. Wallop and Mr. Waller?	10:34
7	MR. GAVENMAN: Objection.	10:31	7	A. I don't remember much.	10:34
8	THE WITNESS: Understand?	10:31	8	Q. What do you remember though?	10:34
9	BY MR. GREIM:	10:31	9	A. I remember specifically what was	10:34
10	Q. Yes. Did you believe?	10:31	10	discussed about the proposal, you know, what to do	10:34
11	MR. GRENDI: Objection.	10:31	11	about what information is required and the back and	10:34
12	MR. GAVENMAN: Objection. This is pretty far	10:31	12	forth.	10:34
13	afield from what Mr. Han is here to testify about.	10:31	13	Q. What did Mr. Guo say he wanted to do	10:34
14	I'm not sure how this is a good use of your time, but	10:31	14	with the research?	10:34
15	you can keep going.	10:32	15	A. He wanted --	10:34
16	THE WITNESS: That discussion is with his	10:32	16	MR. GAVENMAN: Objection.	10:34
17	counsel.	10:32	17	MR. GRENDI: Objection to form.	10:34
18	MR. GAVENMAN: So objection, privilege. I	10:32	18	THE WITNESS: He wanted to expose the	10:34
19	instruct you not to answer.	10:32	19	corruption of the highest-ranking members of the	10:34
20	THE WITNESS: Right.	10:32	20	Communist Party.	10:34
21	BY MR. GREIM:	10:32	21	BY MR. GREIM:	10:34
22	Q. Do you know why Mr. Guo left China?	10:32	22	Q. Did he say how he wanted to do that?	10:34
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1	A. That was during the discussion. How	10:34	1	A. Let's make it clear.	10:38
2	he's going to do it, I don't think he has an idea.	10:35	2	Q. That's right. So Mr. Gertz is the one	10:38
3	We proposed -- I actually talked to French and Mike,	10:35	3	who introduced Wallop and Waller to you and then you	10:38
4	seeing whether we can use some unconventional way to	10:35	4	met with Wallop and Waller after that?	10:38
5	obtain this information.	10:35	5	A. He is introducing them to Miles. I am	10:39
6	Q. Do you know, roughly, when Mr. Guo began	10:35	6	the facilitator to set it up.	10:39
7	speaking out against Communist Part members?	10:36	7	Q. Okay. I'm going to direct you to --	10:39
8	MR. GAVENMAN: Objection the form.	10:36	8	and, first of all, this article is based on Mr.	10:39
9	THE WITNESS: I would say in the America, at	10:36	9	Gertz's interview of Mr. Guo. I want to direct you	10:39
10	least, I know, maybe April of 2017. This is during	10:36	10	first to -- before we do this, let me ask you are you	10:39
11	his interview with Mirror Tv.	10:36	11	aware of an alleged Chinese origin cyber attack on	10:39
12	BY MR. GREIM:	10:36	12	the Hudson Institute?	10:39
13	Q. What the Mirrow Tv?	10:36	13	A. Yes.	10:39
14	A. It's a Chinese language TV, maybe the	10:36	14	Q. And you recall that Guo has frequently	10:39
15	largest Chinese language media group here, based in	10:36	15	cited that as evidence that the Chinese Government is	10:39
16	New York.	10:36	16	out to get him, basically?	10:39
17	Q. Have you seen that interview?	10:36	17	MR. GRENDI: Objection to form.	10:39
18	A. I didn't.	10:36	18	MR. GAVENMAN: Objection to the form.	10:39
19	Q. Have you seen --	10:36	19	THE WITNESS: I didn't know.	10:40
20	A. Maybe just very part.	10:37	20	BY MR. GREIM:	10:40
21	Q. I'm sorry? You may have just seen part	10:37	21	Q. Okay. Were you helping to plan the	10:40
22	of it?	10:37	22	Hudson event?	10:40
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1	A. Maybe a small part of it, not directly	10:37	1	A. Correct.	10:40
2	from Tv. They always, you know, like through You	10:37	2	MR. GRENDI: Objection.	10:40
3	Tube, somebody else posted it.	10:37	3	BY MR. GREIM:	10:40
4	Q. Right. Have you seen other interviews	10:37	4	Q. Are you aware that the Hudson event --	10:40
5	of Mr. Guo on You Tube or on TV?	10:37	5	well, who was in charge of the HUD event within the	10:40
6	A. I might, but very limited.	10:37	6	institute?	10:40
7	Q. Do you remember what articles you	10:37	7	A. It was Charles Davidson at the	10:40
8	reviewed about Mr. Guo's past?	10:37	8	beginning.	10:40
9	A. I didn't.	10:37	9	Q. What was the last name?	10:40
10	[Han Exhibit No. 2 was	10:38	10	A. Davidson, and then I took it over,	10:40
11	marked for identification.]	10:38	11	because he said he's not able to do it. He's afraid	10:40
12	BY MR. GREIM:	10:38	12	that, you know, his son-in-law's -- his son's fiance,	10:40
13	Q. I'm going to show you what we are	10:38	13	who is Chinese, will be retaliated against. So he	10:40
14	marking as Exhibit 2. You'll see this is an article	10:38	14	asked me to take over.	10:40
15	by Bill Gertz, who we mentioned a few times earlier	10:38	15	Q. Who is the person at Hudson who agreed	10:40
16	today. It appeared October 9, 2017.	10:38	16	to cancel the event?	10:40
17	Is this around the time, by the way, that you	10:38	17	A. I think the --	10:40
18	were introducing Ms. Wallop and Mr. Waller to Mr.	10:38	18	MR. GRENDI: Objection to the form.	10:40
19	Guo?	10:38	19	MR. GAVENMAN: Objection.	10:40
20	A. I think this is before the time that he	10:38	20	THE WITNESS: I think the head of -- the CEO,	10:40
21	was introducing.	10:38	21	Ken Winston. I don't know exactly who agreed, but it	10:41
22	Q. That's right.	10:38	22	was Ken called me to tell me it's cancelled.	10:41
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1	THE WITNESS: In the private meeting, he told	10:58	1	[Video presentation.]	11:02
2	me that he's -- he expressed a very completely	10:58	2	MR. GREIM: All right. That's the end of the	11:05
3	different view about Xi, about Communist Party.	10:58	3	clip.	11:05
4	BY MR. GREIM:	10:58	4	MR. GRENDI: I'm sorry. Objection. I just	11:05
5	Q. What do you mean, a completely different	10:58	5	don't understand. Are there two speakers on that or	11:05
6	view?	10:58	6	just one?	11:05
7	A. He's opposing Xi's dictatorship -- put	10:58	7	MR. GREIM: This was -- let me read some more	11:05
8	it that way -- strongly.	10:59	8	background on this. This was pulled from You Tube,	11:05
9	Q. Sir, I'm going to play for you a video	10:59	9	https://youtu.be/whKwLpKbUQ published April 29,	11:05
10	of Mr. Guo speaking. I'm going to see if this is	10:59	10	2017.	11:05
11	something you have heard before and I'm going to see	10:59	11	Let me ask the witness, first of all --	11:05
12	if you at least recognize his voice.	11:00	12	MR. GRENDI: Hold on.	11:05
13	A. Yeah.	11:00	13	BY MR. GREIM:	11:05
14	Q. This will be in Chinese. So the court	11:00	14	Q. Do you recognize the voice on the	11:05
15	reporter will not be able to transcribe it.	11:00	15	recording?	11:05
16	A. Okay.	11:00	16	MR. GRENDI: Objection. Are there two	11:05
17	Q. However, I'm going to distribute a	11:00	17	voices? I don't understand. It says Speaker 1.	11:05
18	translation that we have already served on our	11:00	18	MR. GREIM: Please don't interrupt the	11:05
19	opposing counsel and I'll make it available to you as	11:00	19	questioning. There's only one thing that says	11:06
20	well. We are going to mark this as Han 3.	11:00	20	Speaker 1. There are not two voices.	11:06
21	[Han Exhibit No. 3 was	11:00	21	MR. GRENDI: I don't know.	11:06
22	marked for identification.]	11:01	22	MR GREIM: Please don't interrupt. Please	11:06
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1	MR. GREIM: I'm going to arrange these	11:01	1	don't interrupt the questioning.	11:06
2	speakers so that, hopefully, everybody can hear this	11:01	2	MR. GRENDI: Objection to the entire line of	11:06
3	really well.	11:01	3	questioning. You may continue.	11:06
4	MR. GRENDI: Is this a certified translation?	11:01	4	MR. GAVENMAN: I object as well.	11:06
5	MR. GREIM: Yeah. The affidavit that you	11:01	5	BY MR. GREIM:	11:06
6	received goes with all of these. This has been	11:01	6	Q. All right. Do you recognize the voice	11:06
7	produced to you.	11:01	7	on the recording, sir?	11:06
8	MR. GRENDI: I got a lot of stuff in the last	11:01	8	A. Yes.	11:06
9	few days.	11:01	9	Q. Whose voice is that?	11:06
10	All right. On your representation this is	11:01	10	A. Miles.	11:06
11	certified translation, I would object to the extent	11:01	11	Q. I'm sorry?	11:06
12	it's not certified.	11:01	12	A. Miles.	11:06
13	MR. GREIM: Okay.	11:01	13	Q. Miles?	11:06
14	MR. GRENDI: Thank you.	11:01	14	A. Yes.	11:06
15	MR. GREIM: All right. And here we go. This	11:01	15	Q. Have you heard any part of this before?	11:06
16	is about a three-minute-and-one-second clip.	11:01	16	A. No. This is actually my first time.	11:06
17	Actually, the You Tube version of this, sir, has -- I	11:01	17	Q. And did you hear in the opening that Mr.	11:06
18	know someone from You Tube tried to translate it, and	11:01	18	Guo said I have absolute faith in General Secretary	11:06
19	just so you can see what I'm playing, I'm going to	11:02	19	Xi?	11:06
20	turn my computer screen around so that you can see	11:02	20	MR. GRENDI: Objection.	11:06
21	it. I know it's some distance from you, but I'm	11:02	21	THE WITNESS: Yes.	11:06
22	going to ahead and play.	11:02	22	BY MR. GREIM:	11:06
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1	Q. Did you also hear him criticize certain	11:06	1	MR. GAVENMAN: Objection to form.	11:07
2	dissidents in the United States?	11:06	2	BY MR. GREIM:	11:07
3	A. Yes.	11:06	3	Q. By the way, were you following along	11:07
4	MR. GAVENMAN: Objection to form.	11:06	4	with the translation while you were listening?	11:07
5	MR. GRENDI: Objection.	11:06	5	A. Yeah.	11:07
6	BY MR. GREIM:	11:06	6	Q. Did you find the translation to be	11:07
7	Q. Have you heard him express similar views	11:06	7	generally accurate?	11:07
8	to you?	11:06	8	MR. GRENDI: Objection.	11:07
9	MR. GAVENMAN: Objection to form.	11:06	9	THE WITNESS: No. I didn't look at English.	11:07
10	THE WITNESS: About Xi?	11:06	10	I just looked at the Chinese.	11:08
11	BY MR. GREIM:	11:06	11	BY MR. GREIM:	11:08
12	Q. Let's start with Xi, about Xi.	11:06	12	Q. I see. Did you find the Chinese	11:08
13	MR. GAVENMAN: Objection to form.	11:07	13	transcription to be generally accurate?	11:08
14	THE WITNESS: Never.	11:07	14	MR. GRENDI: Objection to form. He didn't	11:08
15	BY MR. GREIM:	11:07	15	read the English.	11:08
16	Q. Have you heard him express similar views	11:07	16	THE WITNESS: The Chinese, yes.	11:08
17	regarding dissidents?	11:07	17	BY MR. GREIM:	11:08
18	MR. GAVENMAN: Objection to form.	11:07	18	Q. Does it surprise you that Guo made a	11:08
19	MR. GRENDI: Objection.	11:07	19	statement such as this?	11:08
20	THE WITNESS: It depends on what dissidents	11:07	20	MR. GAVENMAN: Objection to form.	11:08
21	you are talking about.	11:07	21	MR. GRENDI: Objection to the form.	11:08
22	BY MR. GREIM:	11:07	22	THE WITNESS: No, not at all.	11:08
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1	Q. So about some dissidents, he has	11:07	1	BY MR. GREIM:	11:08
2	expressed a similar view?	11:07	2	Q. Why not?	11:08
3	MR. GAVENMAN: Objection to form.	11:07	3	A. Chinese politics --	11:08
4	MR. GRENDI: Objection to form.	11:07	4	MR. GAVENMAN: Objection.	11:08
5	THE WITNESS: Yes.	11:07	5	MR. GRENDI: Objection.	11:08
6	BY MR. GREIM:	11:07	6	THE WITNESS: -- are complicated. What he	11:08
7	Q. Okay. What about -- I assume that he	11:07	7	said on a public platform is not what he really	11:08
8	has expressed similar views about Xi Nuo.	11:07	8	intended to say. That's just my understanding and,	11:08
9	A. Yes.	11:07	9	also, activists in this community, not all of them	11:08
10	MR. GAVENMAN: Objection to form.	11:07	10	are real activists. Some are fake. Some are	11:08
11	MR. GRENDI: Objection to form.	11:07	11	actually working for the Chinese regime, including	11:08
12	BY MR. GREIM:	11:07	12	this guy, Xi Nuo.	11:09
13	Q. Has he expressed to you that one of his	11:07	13	BY MR. GREIM:	11:09
14	goals is to punish certain dissidents in the United	11:07	14	Q. So you're aware the Xi Nuo works for the	11:09
15	States?	11:07	15	Chinese regime?	11:09
16	A. He didn't --	11:07	16	A. Yes.	11:09
17	MR. GRENDI: Objection to form.	11:07	17	MR. GAVENMAN: Objection to form.	11:09
18	THE WITNESS: -- put it that way.	11:07	18	BY MR. GREIM:	11:09
19	BY MR. GREIM:	11:07	19	Q. How do you know that?	11:09
20	Q. Did you hear him say in this tape that	11:07	20	A. I have informant that provides that some	11:09
21	they deserve to be punished?	11:07	21	people work with Xi Nuo.	11:09
22	A. Yes.	11:07	22	Q. Let's -- you know what? Let's stop	11:09
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21 (Pages 78 to 81)

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1	there, because everybody -- most people at this	11:09	1	suing others. It's the other side suing him as well.	11:11
2	table, I think, have the same goals and there are --	11:09	2	BY MR. GREIM:	11:11
3	we probably do not need to get into the answer to	11:09	3	Q. Is it your testimony that every	11:11
4	that question.	11:09	4	dissident that Mr. Guo is in litigation with -- well,	11:11
5	Okay. There's just no need to do that here.	11:09	5	let me back up. That's a closed question.	11:11
6	A. Okay.	11:09	6	Let me just ask you this.	11:11
7	MR. GRENDI: Wait. Stop.	11:09	7	A. Yeah.	11:12
8	MR. PODHASKIE: It's one of his best friends	11:09	8	Q. Are you aware of whether Mr. Guo is in	11:12
9	on Twitter. Let him go on and explain.	11:09	9	litigation with any dissident who is not working with	11:12
10	MR. GRENDI: Hold on, Dan. You don't have an	11:09	10	the Chinese regime?	11:12
11	appearance here.	11:09	11	MR. GAVENMAN: Objection to form.	11:12
12	MR. GREIM: I would ask Mr. Podhaskie to	11:09	12	MR. GRENDI: Objection to form.	11:12
13	please stop interfering with the deposition.	11:09	13	THE WITNESS: I'm not sure. I think there	11:12
14	MR. GAVENMAN: As Mr. Han's counsel, he has	11:09	14	are lots of them working with the regime, because	11:12
15	to be allowed to answer the question completely. You	11:09	15	they, themselves, cannot afford this large amount	11:12
16	asked a question. He can answer.	11:10	16	legal bill. Nobody wants to pay that.	11:12
17	MR. GREIM: Fair enough. Fair enough. I	11:10	17	BY MR. GREIM:	11:12
18	detected some hesitance and I wanted to signal to the	11:10	18	Q. As you said earlier, could some of these	11:12
19	witness that we didn't need to hear it, but if you	11:10	19	dissidents be trying in their own way to use the	11:12
20	would like to finish the answer, go ahead.	11:10	20	regime?	11:12
21	MR. GAVENMAN: Please complete you answer,	11:10	21	MR. GAVENMAN: Objection, form.	11:12
22	Mr. Han.	11:10	22	MR. GRENDI: Objection to form.	11:12
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1	THE WITNESS: Ys. We have evidence that Xi	11:10	1	MR. GAVENMAN: Foundation.	11:12
2	Nuo is working with the Chinese regime. I have	11:10	2	THE WITNESS: Yes.	11:12
3	submitted that evidence to the FBI.	11:10	3	BY MR. GREIM:	11:12
4	BY MR. GREIM:	11:10	4	Q. Earlier, we talked a little bit about	11:12
5	Q. By the way, was there anything that you	11:10	5	the visit by Chinese authorities to Mr. Guo in the	11:13
6	heard in the clip that was inaudible to you or that	11:10	6	United States.	11:13
7	you did not understand?	11:10	7	A. Yeah.	11:13
8	A. No.	11:10	8	Q. Do you recall when that occurred?	11:13
9	Q. Are you aware that Mr. Guo has filed	11:10	9	A. I didn't.	11:13
10	several lawsuits against dissidents in the United	11:11	10	Q. Does May 2017 sound correct to you?	11:13
11	States?	11:11	11	A. Yes.	11:13
12	MR. GAVENMAN: Objection to form.	11:11	12	MR. GAVENMAN: Objection to form.	11:13
13	MR. GRENDI: Objection to form.	11:11	13	MR. GRENDI: Objection to form.	11:13
14	THE WITNESS: Yes.	11:11	14	BY MR. GREIM:	11:13
15	BY MR. GREIM:	11:11	15	Q. Is that one of the -- did part of your	11:13
16	Q. And have you advised Mr. Guo on those	11:11	16	research into Mr. Guo involve reading accounts of the	11:13
17	lawsuits?	11:11	17	visit by Chinese officials to Guo's apartment?	11:13
18	MR. GAVENMAN: Objection to form.	11:11	18	MR. GRENDI: Objection.	11:14
19	THE WITNESS: No, but I did ask him not to	11:11	19	THE WITNESS: Yes.	11:14
20	get involved, because my reason is this is Chinese	11:11	20	BY MR. GREIM:	11:14
21	Communist regime strategy, to get him involved in the	11:11	21	Q. And did Guo also discuss the visit with	11:14
22	lawsuit, consume his resources. It's not just him	11:11	22	you?	11:14
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22 (Pages 82 to 85)

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1	A. That was with the counsel.	11:14	1	MR. GREIM: Sure, but whether Mr. Guo has	11:15
2	Q. With counsel?	11:14	2	recordings of these meetings is not a privileged	11:15
3	A. Yes.	11:14	3	matter. Is it a fact. It either happened or it did	11:16
4	Q. Okay. By the way, just to -- I want to	11:14	4	not.	11:16
5	be clear about this. Who were the names of the Clark	11:14	5	THE WITNESS: I didn't know that.	11:16
6	Hill attorneys who were involved in that matter? Do	11:14	6	MR. GAVENMAN: Please don't reveal anything	11:16
7	you remember?	11:14	7	that you learned in a privileged conversation.	11:16
8	MR. GREIM: Objection.	11:14	8	THE WITNESS: Yeah. I didn't know whatever	11:16
9	THE WITNESS: Thomas Ragland.	11:14	9	public information, but all I know is what I learned	11:16
10	BY MR. GREIM:	11:14	10	from the counsel regarding the meetings.	11:16
11	Q. Okay.	11:14	11	[Han Exhibit No. 4 was	11:16
12	A. It's public information, by the way.	11:14	12	marked for identification.]	11:16
13	Q. Jay Johnson, was he one of them?	11:14	13	BY MR. GREIM:	11:16
14	A. Never heard of him.	11:14	14	Q. I'm going to show you what we're marking	11:16
15	Q. Are you aware that Mr. Guo recorded all	11:14	15	as Exhibit 4, and you'll see this is a "Wall Street	11:16
16	or large portions of those meetings?	11:15	16	Journal" article from October 22, 2017 and it goes on	11:17
17	MR. GAVENMAN: Objection --	11:15	17	for about six pages.	11:17
18	MR. GREIM: Objection.	11:15	18	A. Right.	11:17
19	MR. GAVENMAN: -- to form. You're talking	11:15	19	Q. But you'll see that the main topic here	11:17
20	about a privileged conversation?	11:15	20	is about the visit of the Chinese officials to Mr.	11:17
21	MR. GREIM: No. I'm sorry. Let me -- not	11:15	21	Guo.	11:17
22	meetings with Clark Hill.	11:15	22	A. Right.	11:17
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1	MR. GAVENMAN: Okay.	11:15	1	Q. Correct?	11:17
2	BY MR. GREIM:	11:15	2	A. Um-hum.	11:17
3	Q. Are you aware that Mr. Guo recorded all	11:15	3	Q. And is that a picture of Mr. Guo at the	11:17
4	or portions of his meetings with Chinese officials?	11:15	4	top there?	11:17
5	MR. GAVENMAN: Objection.	11:15	5	A. Yes.	11:17
6	MR. GREIM: Objection to form, relevance.	11:15	6	Q. Is that taken in his Sherry Netherland	11:17
7	THE WITNESS: With the counsel. That was	11:15	7	apartment?	11:17
8	also with counsel.	11:15	8	MR. GREIM: Objection.	11:17
9	BY MR. GREIM:	11:15	9	THE WITNESS: It looks like it.	11:17
10	Q. I'm sorry. I could not actually hear	11:15	10	BY MR. GREIM:	11:17
11	your answer over the objections. You're saying, yes,	11:15	11	Q. All right. Do you see in the third	11:17
12	he recorded meetings with counsel?	11:15	12	paragraph, it says: "Liu Yanping, the lead official,	11:17
13	MR. GAVENMAN: No.	11:15	13	said he had come on behalf of Beijing 'to find a	11:17
14	THE WITNESS: No. I said that's information	11:15	14	solution', according to Mr. Guo and a partial audio	11:18
15	--	11:15	15	recording Mr. Guo said he made of the May encounter	11:18
16	MR. GAVENMAN: Mr. Han. Mr. Han.	11:15	16	and posted online in September."	11:18
17	So what he's saying is, again, there was	11:15	17	Do you see that?	11:18
18	conversations with counsel present that were	11:15	18	A. Um-hum.	11:18
19	privileged conversations where he discussed this	11:15	19	Q. Now let me ask you -- I don't want to	11:18
20	material. So he cannot get into that area. That's	11:15	20	know -- well, unfortunately, you've got this	11:18
21	what he's saying.	11:15	21	continuing instruction and if you heard it from	11:18
22	Please do not answer.	11:15	22	counsel, you can't even state the facts. I'm going	11:18
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1	to ask you whether you recall reading articles like	11:18	1	THE WITNESS: That is with the counsel in the	11:20
2	this about Mr. Guo's recording of the May encounter.	11:18	2	meeting.	11:20
3	MR. GRENDI: Objection.	11:18	3	MR. GREIM: Wait a minute. Wait, wait, wait.	11:20
4	THE WITNESS: This is the first time I read	11:18	4	Now, whether he's listened to it is not	11:20
5	this article.	11:18	5	privileged information. I'm not going to ask him the	11:20
6	BY MR. GREIM:	11:18	6	content of it, but it's a yes or no question -- yes	11:21
7	Q. Okay. Well, when you first met Mr. Guo,	11:18	7	or no answer whether he has listened to it. I don't	11:21
8	I suppose this had already happened, hadn't it?	11:18	8	want to know anything else about the circumstance.	11:21
9	Because you said you met him for the first time in	11:19	9	MR. GAVENMAN: I'm also very concerned here	11:21
10	July or August?	11:19	10	about attorney work product privilege and what's	11:21
11	A. Correct.	11:19	11	happening in that case. I mean, it's not just the	11:21
12	MR. GRENDI: Objection.	11:19	12	facts. It's not just what communications. There's	11:21
13	BY MR. GREIM:	11:19	13	attorney work product that's happening here, clearly,	11:21
14	Q. By the way, have you met Steven Bannon	11:19	14	and you need to stay away from it.	11:21
15	before?	11:19	15	You need to stay away. I don't know why	11:21
16	MR. GRENDI: Objection. What does that have	11:19	16	you're bothering to go in there anyway, recordings,	11:21
17	to do with this case, Counsel? I'm sorry, but Steve	11:19	17	not recordings. I mean, we don't need to be invading	11:21
18	Bannon, where does he come in? I just don't get it.	11:19	18	this privilege to get to the facts of this case.	11:21
19	MR. GREIM: Read the counterclaim.	11:19	19	I mean, we're going to have a long day here	11:21
20	MR. GRENDI: I have. You put in stuff about	11:19	20	if we're doing this and let's stay away from	11:21
21	Steve Bannon that has nothing to do with the case.	11:19	21	privileged information and get to the parts that	11:21
22	MR. GREIM: Please don't use up our time on	11:19	22	matter, please.	11:21
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1	the record.	11:19	1	MR. GREIM: Well, we disagree to your claims	11:21
2	Go ahead.	11:19	2	of privilege. We're just trying to work around them	11:21
3	THE WITNESS: Before this?	11:19	3	so that we can get through.	11:21
4	BY MR. GREIM:	11:19	4	BY MR. GREIM:	11:21
5	Q. Yes.	11:19	5	Q. Did you -- let me -- okay. Let's go a	11:21
6	A. Before what?	11:19	6	little further.	11:22
7	Q. Well, let's say when did you -- have you	11:19	7	Why did you say that this incident of Mr. Guo	11:22
8	worked with Mr. Bannon in connection with Mr. Guo?	11:19	8	meeting with the Chinese officials may have been a	11:22
9	MR. GAVENMAN: Objection to form.	11:19	9	turning point for Mr. Guo?	11:22
10	MR. GRENDI: Objection.	11:19	10	MR. GRENDI: Objection.	11:22
11	THE WITNESS: Bannon was introduced to him on	11:19	11	MR. GAVENMAN: Objection.	11:22
12	October, early October of 2017.	11:19	12	THE WITNESS: I think because they were	11:22
13	BY MR. GREIM:	11:19	13	arrested, detained by the FBI. I think the Chinese	11:22
14	Q. By you?	11:19	14	official may have believed that Miles sold them out	11:22
15	A. By Bill Gertz, not me.	11:19	15	and that he's working with American Government,	11:23
16	Q. Now, how do you know that?	11:20	16	busted them, take away their cellphones, computers.	11:23
17	A. Because I was with them.	11:20	17	Yeah.	11:23
18	Q. Okay. Have you ever listened to a	11:20	18	BY MR. GREIM:	11:23
19	recording of Mr. Guo's meeting with Chinese	11:20	19	Q. All right. So that's -- I understand	11:23
20	officials?	11:20	20	that's what you think the Chinese officials may	11:23
21	MR. GRENDI: Objection.	11:20	21	believe.	11:23
22	MR. GAVENMAN: Objection.	11:20	22	A. Right.	11:23
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1	Q. Now my next question is how do you know	11:23	1	THE WITNESS: I don't know. This is a little	11:25
2	-- what makes you believe that? What facts do you	11:23	2	too far, you know.	11:25
3	have that form the basis for that belief?	11:23	3	MR. GRENDI: I'm just going to hop in here.	11:25
4	MR. GAVENMAN: Objection to form.	11:23	4	If we went to the judge with this right now, she	11:25
5	MR. GRENDI: Objection.	11:23	5	would say why are you asking these questions, please	11:25
6	THE WITNESS: I think since then, there was a	11:23	6	move it along. I'm pretty sure that's what she would	11:25
7	-- as far as I can tell, the Chinese never sent	11:23	7	say, because this has zero connection to whether or	11:25
8	another team to communicate with Miles, just on my	11:23	8	not Eastern Profit --	11:26
9	knowledge, based on my best knowledge.	11:23	9	THE WITNESS: Can I get some water?	11:26
10	BY MR. GREIM:	11:24	10	MR. GRENDI: -- and Strategic Vision --	11:26
11	Q. Since then, has Guo sent anyone to China	11:24	11	MR. GREIM: Why don't we do this. We have	11:26
12	to communicate with Chinese officials?	11:24	12	five minutes left. I mean, this goes directly to	11:26
13	A. I don't know.	11:24	13	whether Mr. Guo is working with the regime or not.	11:26
14	MR. GRENDI: Objection.	11:24	14	This would be one of the contacts, but let's take a	11:26
15	MR. GAVENMAN: Objection to form.	11:24	15	break. We have five minutes left on the tape. Let's	11:26
16	THE WITNESS: I have no knowledge.	11:24	16	take about a five- or ten-minute break.	11:26
17	BY MR. GREIM:	11:24	17	VIDEOGRAPHER: This end Disk No. 1, going off	11:26
18	Q. Do you know whether Guo sent Steve	11:24	18	the record. The time is now 11:28 a.m.	11:26
19	Bannon to communicate with Wang Qishan?	11:24	19	[Recess.]	11:41
20	MR. GAVENMAN: Objection.	11:24	20	VIDEOGRAPHER: This begins Disk No. 2 in the	11:41
21	MR. GRENDI: Objection, relevance.	11:24	21	video deposition of Lianchao Han. We are back on the	11:41
22	THE WITNESS: That's not possible.	11:24	22	record. The time is 11:43 a.m.	11:41
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1	BY MR. GREIM:	11:24	1	BY MR. GREIM:	11:41
2	Q. Why do you say that?	11:24	2	Q. Okay. Mr. Han --	11:41
3	A. Wang Qishan invited Bannon to China	11:24	3	A. Yes.	11:41
4	before he even know who Miles Kwok is.	11:24	4	Q. -- I'm going to make sure something is	11:41
5	Q. Before who knows who Miles Kwok was?	11:24	5	very clear from our last series of questions. Is it	11:41
6	A. Before Steve had ever heard his name.	11:24	6	true that you have knowledge of the purpose of the	11:42
7	Q. How do you know that?	11:24	7	Bannon trip to Wang Qishan?	11:42
8	A. Because at the time, he was -- the	11:24	8	MR. GRENDI: Objection.	11:42
9	timeline, just look at the timeline. I forgot when	11:24	9	MR. GAVENMAN: Objection.	11:42
10	he went to China, but that was way before Steve met	11:25	10	You can answer.	11:42
11	with the Miles Kwok.	11:25	11	THE WITNESS: I don't know exactly what's the	11:42
12	Q. Do you know who arranged the Bannon-Wang	11:25	12	purpose, but I know for a fact it has nothing to do	11:42
13	Qishan meeting?	11:25	13	with Miles Kwok.	11:42
14	MR. GRENDI: Objection.	11:25	14	BY MR. GREIM:	11:42
15	MR. GAVENMAN: Objection.	11:25	15	Q. Well, now that you -- I have to ask you	11:42
16	THE WITNESS: Is that relevant? I think John	11:25	16	how do you know for a fact it has nothing to do with	11:42
17	Thornton.	11:25	17	it?	11:42
18	BY MR. GREIM:	11:25	18	A. Because Steve talked to me about his	11:42
19	Q. And do you know whether Bannon discussed	11:25	19	trip.	11:42
20	Guo with Wang Qishan?	11:25	20	Q. Okay. What did he tell you? What did	11:42
21	MR. GAVENMAN: Objection.	11:25	21	he tell you the purpose of the trip was?	11:42
22	MR. GRENDI: Objection. How would he know?	11:25	22	MR. GRENDI: Objection. Why are we talking	11:42
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1	about a trip when the witness just said it has	11:42	1	that I can show you here in a moment, but I just want	11:45
2	nothing to do with this case?	11:42	2	you to take a look at this and tell me whether, now	11:46
3	MR. GREIM: Well, he said it doesn't. He was	11:42	3	having looked through this document, you have ever	11:46
4	about to tell us why it doesn't.	11:42	4	heard of it or seen it before.	11:46
5	THE WITNESS: First of all, Steve didn't know	11:42	5	A. Never heard, never seen this before.	11:46
6	Miles. He never heard of Miles before this trip. I	11:42	6	Can I see the Chinese version?	11:46
7	mean during this during this trip.	11:42	7	Q. Yes. I'm going to play for you a	11:46
8	He met with Miles on October 6th, I think I	11:42	8	newscast with, I believe, the Mirror in which Mr.	11:46
9	believe of 2017. So he didn't know, and that meeting	11:42	9	Wengui discusses -- I'm sorry -- Mr. Guo discusses	11:46
10	was about economic nationalism. Wang Qishan lectured	11:43	10	the letter. I'm going to go ahead for our counsel	11:46
11	him for the entire session of his meeting. That's	11:43	11	here and I'm going to go ahead and mark as Exhibit 6	11:46
12	what Bannon told me.	11:43	12	a transcription and translation of that. Again, this	11:46
13	BY MR. GREIM:	11:43	13	has been previously produced to counsel and the	11:47
14	Q. Is that the extent of your knowledge	11:43	14	translation is accompanied with an affidavit of the	11:47
15	about the trip?	11:43	15	translator, Jessica Ju. This is from	11:47
16	A. Correct.	11:43	16	https://youtu.be/7qVmEsw_ZX8, and it was published on	11:47
17	Q. All right. Have you ever discussed the	11:43	17	January 18, 2018.	11:47
18	trip with Guo Wengui?	11:43	18	What I'm going to do, sir, is I'm going to try	11:47
19	A. No, because the meeting, you know, what	11:43	19	to make sure you can see my screen, because the	11:47
20	Steve and Miles, when we sit down, Steve told what	11:43	20	newscast --	11:47
21	happened.	11:43	21	[Video presentation.]	11:47
22	Q. Okay. I'm sorry. Steve told Miles what	11:43	22	MR. GREIM: I'm pausing it. What I'm going	11:48
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1	happened?	11:43	1	to do is move my computer closer to you without	11:48
2	A. Steve, me, Miles, we have a dinner,	11:43	2	wrecking the entire setup that we have here.	11:48
3	several dinners. So I think at the beginning, you	11:44	3	THE WITNESS: Yeah. Oh, that's the Chinese	11:48
4	know, he mentioned about this trip. He described the	11:44	4	version?	11:48
5	meeting with Wang Qishan.	11:44	5	MR. GREIM: Yes, sir, but I just encourage	11:48
6	Q. Are you aware of a letter that Mr. Guo	11:44	6	you to listen, and if there were even a way for you	11:48
7	wrote to President Xi in August of 2017?	11:44	7	to pause as you need to --	11:48
8	A. I didn't.	11:44	8	THE WITNESS: Yeah.	11:48
9	Q. Have you ever heard of that before?	11:44	9	MR. GREIM: -- I'll try to allow that.	11:48
10	A. No.	11:44	10	THE WITNESS: Okay.	11:48
11	[Han Exhibit No. 5 was	11:44	11	MR. GREIM: And what you may do is, if you	11:48
12	marked for identification.]	11:45	12	know how to work this --	11:48
13	BY MR. GREIM:	11:45	13	THE WITNESS: That's fine. I can listen.	11:48
14	Q. I'm going to show you what we are	11:45	14	MR. GREIM: Okay.	11:48
15	marking as Exhibit 5, and what I'm showing you here	11:45	15	[Video presentation.]	11:49
16	is a certified translation that was filed in the New	11:45	16	THE WITNESS: This is a half an hour thing.	11:49
17	York County Supreme Court in another matter, and this	11:45	17	Are we going to go through everything?	11:49
18	purports to be a letter from Guo Wengui to the	11:45	18	[Mr. Greim gestures in the negative.]	11:50
19	Honorable Leader, parentheses "S". It starts with	11:45	19	[Continued video presentation.]	11:53
20	"Greetings" and it's signed, Respectfully, s/Guo	11:45	20	MR. GREIM: All right. I have stopped this	11:56
21	Wengui, August 26, 2017.	11:45	21	exactly at seven minutes and thirty seconds. As the	11:56
22	Now, I've got an actual Chinese copy of this	11:45	22	witness points out, this particular clip is a total	11:56
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1	of about 23 minutes and eventually goes to 31:43. We	11:56	1	THE WITNESS: Just exactly the same letter,	11:58
2	won't play the entire clip here, but we can if it's	11:56	2	just done into segments.	11:58
3	necessary.	11:56	3	BY MR. GREIM:	11:58
4	BY MR. GREIM:	11:56	4	Q. Okay. And so let me ask you again, now	11:58
5	Q. So my question to the witness, first of	11:56	5	that you've seen it in Chinese --	11:58
6	all, is that -- what did you see, first of all, on	11:56	6	A. Yeah.	11:58
7	the video?	11:56	7	Q. -- and you've heard Mr. Guo talking	11:58
8	A. What did I see?	11:56	8	about it, had you ever heard of this letter before	11:58
9	Q. Sure.	11:56	9	today?	11:58
10	MR. GRENDI: I'll just object to line of	11:56	10	MR. GAVENMAN: Objection, form.	11:58
11	questioning.	11:56	11	THE WITNESS: No. This is the first time I	11:58
12	THE WITNESS: Just, you know, it's his letter	11:56	12	saw this video clip. I didn't know the letter.	11:58
13	to the Chinese leaders and he explains who he	11:56	13	BY MR. GREIM:	11:58
14	addressed it to.	11:56	14	Q. Okay. Well, if we could go to the	11:58
15	BY MR. GREIM:	11:56	15	English version --	11:58
16	Q. And who is interviewing Mr. Guo?	11:56	16	A. Yes.	11:58
17	A. Chen Xiaoping.	11:57	17	Q. -- you'll see that the beginning of the	11:58
18	Q. Who is that?	11:57	18	letter after the word "Greetings" says: "Thank you	11:58
19	A. Chen Xiaoping is the host of Mirror Tv.	11:57	19	very much for your hospitality to meet members of my	11:58
20	Q. This is the TV program you mentioned	11:57	20	family and staff yesterday."	11:59
21	earlier?	11:57	21	Do you see that?	11:59
22	A. Correct.	11:57	22	A. Yes.	11:59
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1	Q. All right. And do you recognize Mr. Guo	11:57	1	MR. GAVENMAN: I'm just going to object to	11:59
2	and Mr. Guo's voice answering his questions?	11:57	2	the extent this is not an accurate translation, just	11:59
3	A. Yes.	11:57	3	to that extent, but we can go on.	11:59
4	Q. And did you hear Mr. Guo to ask the host	11:57	4	MR. GRENDI: Same objection.	11:59
5	that the letter be put up on the screen?	11:57	5	BY MR. GREIM:	11:59
6	A. Correct.	11:57	6	Q. Now, we can go back to Chinese text, if	11:59
7	MR. GRENDI: Objection.	11:57	7	you would like, sir, to take a look at the --	11:59
8	BY MR. GREIM:	11:57	8	A. Yeah. Let's go back and see exactly. I	11:59
9	Q. And did you see the letter?	11:57	9	think there is a mistranslation here. I can see at	11:59
10	A. Yes.	11:57	10	least one error here, but that's the Chinese -- the	11:59
11	Q. How many pages did it have?	11:57	11	English version. It's the beginning of the letter, I	11:59
12	A. Four or five. Four.	11:57	12	think.	12:00
13	Q. Were you able to read it in Chinese?	11:57	13	Q. You're now looking at the beginning of	12:00
14	A. Yes.	11:57	14	the letter?	12:00
15	Q. And then after the actual letter was	11:57	15	A. Yeah. Can we enlarge this a little bit?	12:00
16	shown, did you see a transcription that followed	11:57	16	Q. I'm afraid we can't.	12:00
17	while some piano music played?	11:57	17	A. I can't read it.	12:00
18	A. Yes.	11:57	18	Q. Let me see if I can, sir.	12:00
19	Q. What were Chinese characters in the	11:57	19	A. There it goes.	12:00
20	transcription after the letter?	11:57	20	Q. And you can feel free to use my controls	12:00
21	MR. GRENDI: Objection.	11:57	21	on the my computer to move. We may have a few other	12:00
22	MR. GAVENMAN: Objection.	11:57	22	questions on other pages here.	12:00
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1	[Witness peruses document.]	12:00	1	translation.	12:03
2	THE WITNESS: Yeah.	12:00	2	BY MR. GREIM:	12:03
3	BY MR. GREIM:	12:01	3	Q. Well, what -- which of those conditions,	12:03
4	Q. So was there a mistranslation in the	12:01	4	are any of the conditions inaccurate in the	12:03
5	transcription that I showed you?	12:01	5	transcription?	12:03
6	A. Just for this part, no, for the first	12:01	6	A. Yeah. Roughly, it's correct, but he's	12:03
7	paragraph.	12:01	7	talking about like overseas, to stop overseas use the	12:03
8	Q. Okay. Now, are you aware of a -- other	12:01	8	army. He uses a specific term, sui jin. Sui jin	12:03
9	than the meeting that we talked about earlier in May,	12:01	9	means -- how to translate?	12:03
10	are you aware of another meeting between Mr. Guo and	12:01	10	Sui jin is the Communist hired thugs or hired	12:03
11	any Chinese officials?	12:01	11	crowds that's suing him. So that was not translated	12:03
12	A. No.	12:01	12	accurately.	12:04
13	Q. Do you see under paragraph 1 of the	12:01	13	Q. I see. So does that apply to the phrase	12:04
14	English translation, under paragraph 1, Mr. Guo is	12:01	14	that says "drop the illegal action that is being	12:04
15	making certain requests of the Chinese leaders? Are	12:01	15	taken against me overseas"?	12:04
16	you aware of him having made such requests in or	12:01	16	A. Yeah, but he's specifically -- by those	12:04
17	around August of 2017?	12:01	17	hired, you know, sui jin, army of Communist Party.	12:04
18	MR. GRENDI: Objection.	12:01	18	Q. Let me take you to the first -- if you	12:04
19	MR. GAVENMAN: Objection, form.	12:01	19	continue in that paragraph, there are some text in	12:04
20	THE WITNESS: I didn't know he made any	12:01	20	bold. It's in bold both in Chinese characters and in	12:04
21	requests, specific requests, like that, but I know	12:01	21	English translation.	12:04
22	there were -- he tried to negotiation -- tried to	12:02	22	A. Yeah.	12:04
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1	negotiate to protect his employees, his assets.	12:02	1	Q. And it says: "My current situation can	12:04
2	That, I know in general.	12:02	2	be summed up in eight Chinese characters", colon and	12:04
3	BY MR. GREIM:	12:02	3	then after that, it's bolded: "I am now doing things	12:04
4	Q. If you look on -- let's go to the second	12:02	4	not out of my own volition and talking things that I	12:04
5	paragraph. You'll see he says: "The key condition	12:02	5	do not really mean."	12:04
6	for me to desist from revealing information is that	12:02	6	Do you see that?	12:05
7	you take my name off the Red Notice --	12:02	7	A. I saw that.	12:05
8	A. Yes.	12:02	8	Q. Is that a correct Chinese translation?	12:05
9	Q. -- "permit me to resume the operation of	12:02	9	A. Roughly, yes.	12:05
10	my business in Hong Kong and drop the legal action	12:02	10	Q. Did Mr. Guo ever express a similar	12:05
11	that is being taken against me overseas."	12:02	11	sentiment to you?	12:05
12	Did I read that correctly?	12:02	12	MR. GRENDI: Objection.	12:05
13	A. Yes.	12:02	13	BY MR. GREIM:	12:05
14	Q. And can you satisfy yourself that that	12:02	14	Q. About his speech in the United States?	12:05
15	is, in fact, what's in the Chinese version of the	12:02	15	MR. GAVENMAN: Objection, form.	12:05
16	letter?	12:02	16	MR. GRENDI: Objection.	12:05
17	And if you need to, if it's not on this page,	12:02	17	THE WITNESS: No.	12:05
18	we can toggle to the next.	12:02	18	BY MR. GREIM:	12:05
19	A. Okay.	12:03	19	Q. Then if you go on, there's some more	12:05
20	[Witness peruses document.]	12:03	20	that's bolded. I want to ask you about the English	12:05
21	THE WITNESS: It's roughly correct, but it's	12:03	21	sentence that says: "My public exposures of	12:05
22	not straight -- you know, it's not an accurate	12:03	22	information before."	12:05
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1	A. Where is that?	12:05	1	very end and then we're just about done with this,	12:07
2	Q. It's about two sentences later?	12:05	2	sir.	12:08
3	A. Here, in the English?	12:05	3	A. All right.	12:08
4	Q. Oh, yes, in the English. I'm just going	12:05	4	Q. If you go to page 5 of the	12:08
5	to point out to you.	12:05	5	transcription -- actually, I think it's really page	12:08
6	A. Okay.	12:05	6	3. Sorry. You'll see that there is a little six.	12:08
7	Q. "My public exposures of information	12:05	7	A. Yeah.	12:08
8	before was done under coercion. My choice to perform	12:05	8	Q. It says "A few".	12:08
9	publicly was not voluntary."	12:05	9	A. Yes.	12:08
10	Do you see that in the Chinese?	12:05	10	Q. Actually, before we get there, it's	12:08
11	A. Yeah. It's not a very accurate	12:05	11	really under five. I apologize. You'll see it says:	12:08
12	translation.	12:06	12	"I will put our national interest first and I am	12:08
13	Q. Okay. How would you, if you could --	12:06	13	willing to devote my life to protecting our nation's	12:08
14	what is inaccurate about it?	12:06	14	interest to defend Chairman Xi Jinping's value as our	12:08
15	MR. GAVENMAN: Objection to form.	12:06	15	nation's core faith and make ultimate dedication of	12:08
16	MR. GRENDI: Objection.	12:06	16	myself to safeguard Chairman Xi Jinping."	12:08
17	THE WITNESS: Let's see. So he basically	12:06	17	Did I read that correctly?	12:08
18	says they hold the entire situation, it's not alone I	12:06	18	A. Yes, you read that correctly, but let me	12:08
19	can decide and control, and it's involved with my --	12:06	19	just see what's the Chinese version.	12:08
20	the country I reside in and other relevant interests,	12:06	20	Q. Absolutely. Let's go there.	12:08
21	stakeholders.	12:06	21	[Video presentation.]	12:09
22	BY MR. GREIM:	12:06	22	THE WITNESS: This is No. 5?	12:09
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1	Q. That actually wasn't the sentence I read	12:06	1	BY MR. GREIM:	12:09
2	to you, but I see that.	12:06	2	Q. Yes, sir. Do we need to go to another	12:09
3	A. Right. Right, but after that, he says,	12:06	3	page?	12:09
4	you know, like the whistle-blowing exposure before	12:06	4	A. No, no. This is the page.	12:09
5	was forced and also like a reluctant choice.	12:07	5	[Witness peruses document.]	12:09
6	Q. I see.	12:07	6	THE WITNESS: Yeah. I get it.	12:10
7	A. So that would be my understanding of the	12:07	7	BY MR. GREIM:	12:10
8	translation.	12:07	8	Q. Is that an accurate translation?	12:10
9	Q. So instead of done under coercion and	12:07	9	MR. GRENDI: Objection.	12:10
10	was not voluntary, you would say forced?	12:07	10	THE WITNESS: It's not -- you know, I think	12:10
11	A. Yes, because how you translate the whole	12:07	11	it's exaggerated a little bit on the side of -- yeah.	12:10
12	paragraph, the context of the thing.	12:07	12	It's a different tone, yeah, different. The scale of	12:10
13	Q. Did Mr. Guo ever tell you that he felt	12:07	13	emphasis, yeah, roughly correct.	12:10
14	he was forced to engage in his whistle-blowing speech	12:07	14	BY MR. GREIM:	12:10
15	in the U.S.?	12:07	15	Q. Okay. I mean, the English translation	12:10
16	MR. GRENDI: Objection.	12:07	16	ends with an exclamation point. Right?	12:10
17	THE WITNESS: I don't think so, because it	12:07	17	A. Right. Chinese also.	12:10
18	depends on, you know, how it's forced, forced by the	12:07	18	Q. Chinese also, okay. So what is it in	12:10
19	situation, forced by the individual. He didn't	12:07	19	the English translation that you would change then?	12:10
20	specify that.	12:07	20	I want to make sure I understand precisely where you	12:10
21	BY MR. GREIM:	12:07	21	disagree with this translation.	12:10
22	Q. If you could go to -- let's go to the	12:07	22	MR. GRENDI: Objection.	12:10
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1	THE WITNESS: Let's see I think it's the	12:10	1	resources momentarily into best serving Chairman Xi	12:13
2	tone. Yeah. It's not -- I mean, it's roughly	12:10	2	Jinping's Chinese Dream", exclamation point.	12:13
3	correct.	12:10	3	A. Yes.	12:13
4	BY MR. GREIM:	12:10	4	Q. Is that fair?	12:13
5	Q. Okay.	12:10	5	A. Yes.	12:13
6	A. That's my -- the tone seems to me more	12:10	6	Q. And then under -- let's skip to "G".	12:13
7	weighted on, you know, how he's going to devote	12:11	7	A. "G"?	12:13
8	everything.	12:11	8	Q. Which might have to be the next page	12:13
9	Q. Do you have any doubt that Mr. Guo	12:11	9	now.	12:13
10	actually sent this letter?	12:11	10	A. Yeah.	12:13
11	A. I have no idea if he did or not.	12:11	11	[Video presentation.]	12:13
12	Q. Okay. Let me take you now to the final	12:11	12	THE WITNESS: Yes.	12:13
13	part of this paragraph 6, and that may go into the	12:11	13	BY MR. GREIM:	12:14
14	next page. Do we need to change yet?	12:11	14	Q. And the English translation is in bold	12:14
15	A. No, not yet. Let me just see what you	12:11	15	and italics. It says: "Assign me tasks to	12:14
16	want.	12:11	16	accomplish in furtherance of our national interests	12:14
17	Q. So you see six says: "A few small	12:11	17	initiative and engage in Chairman Xi Jinping's global	12:14
18	suggestions from the bottom of Wengui's heart."	12:11	18	strategy so that I can redeem myself by my good	12:14
19	A. Yeah.	12:11	19	service, demonstrating my patriotism and loyalty to	12:14
20	Q. Then he has actually, A, B, C, D, E, F,	12:11	20	Chairman Xi Jinping."	12:14
21	and G.	12:11	21	Did I read that correctly?	12:14
22	A. Correct.	12:11	22	A. This is number -- it should be number	12:14
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1	Q. And so if you look under "A", he says:	12:11	1	what? Let's see.	12:14
2	"Give Wengui an opportunity to chant for our nation."	12:11	2	Q. "G", 6(g).	12:14
3	And then the translator says that they have	12:12	3	A. One, two, three, four, five, six, seven.	12:14
4	added Communist China. Do you see?	12:12	4	The last one?	12:14
5	A. Yeah.	12:12	5	Q. Correct.	12:14
6	Q. That's not in the Chinese. Correct?	12:12	6	A. Yeah. Yes.	12:14
7	A. No. That's not in Chinese.	12:12	7	Q. Is that an accurate translation?	12:15
8	Q. Then he says: "In advocating our	12:12	8	A. Not quite.	12:15
9	nation's legal system solely for propagandizing	12:12	9	Q. What is off in the translation?	12:15
10	Chairman Xi Jinping's call for the Rule of Law in	12:12	10	A. I think he says let's redeem myself,	12:15
11	China", exclamation point.	12:12	11	like let me correct my mistakes and perform, you	12:15
12	A. Right, but that's also -- this	12:12	12	know, like contribute. Yeah.	12:15
13	translation is bad. It's not accurate. Yeah. It	12:12	13	Q. So other than -- so you would change	12:15
14	is, you know, like advocating for nation's legal	12:12	14	"redeem" to "correct my mistakes"?	12:15
15	system beauty.	12:12	15	A. Yeah.	12:15
16	Q. Okay. And does it --	12:12	16	Q. And will you have any change to good	12:15
17	A. There's no for propaganda. You know,	12:12	17	service, demonstrating my patriotism and loyalty to	12:15
18	like a -- yeah. There is that propaganda. Sorry.	12:12	18	Chairman Xi Jinping?	12:15
19	Advocate, you can see advocate for Xi Jinping's Rule	12:12	19	A. That is -- it's not accurate	12:15
20	of Law in Chinese. It's a matter of translation.	12:12	20	translation, because I want to use the translation,	12:16
21	Q. Okay. And then if you look at "B":	12:13	21	direct translation, literal translation, use the	12:16
22	"Can you consider to convert Wengui's influence and	12:13	22	result to express my support of Xi and my patriots.	12:16
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1	Q. Very well. Okay. Now, have you ever	12:16	1	MR. GRENDI: Objection to form.	12:18
2	heard Guo Wengui express similar sentiments?	12:16	2	THE WITNESS: I don't specifically know that.	12:18
3	A. No.	12:16	3	BY MR. GREIM:	12:18
4	Q. And when you helped to set up the	12:16	4	Q. Did he do it after this?	12:18
5	meeting between Strategic Vision and Guo Wengui, you	12:16	5	MR. GRENDI: Objection.	12:18
6	were not aware of this letter?	12:16	6	MR. GAVENMAN: Objection.	12:18
7	A. No.	12:16	7	THE WITNESS: I think there's plenty he did	12:18
8	Q. Do you know whether Guo Wengui received	12:16	8	after that, but I just didn't follow whatever he	12:18
9	the specific instructions he was asking for in this	12:16	9	said.	12:18
10	letter?	12:16	10	BY MR. GREIM:	12:18
11	MR. GAVENMAN: Objection to form.	12:16	11	Q. And your testimony is that you have no	12:18
12	MR. GRENDI: Objection.	12:16	12	knowledge of any other contacts -- well, let me	12:18
13	THE WITNESS: No, but he explained what	12:16	13	strike that.	12:18
14	instructions he got from the video.	12:16	14	You have no knowledge of any contacts that Guo	12:18
15	BY MR. GREIM:	12:16	15	or anyone working on his behalf had with the Chinese	12:18
16	Q. Oh. Do you believe in the video, he	12:16	16	Government after August of 2017?	12:18
17	actually explains the instructions he did receive?	12:17	17	MR. GRENDI: Objection.	12:19
18	A. Yes. Yes. You have to give the	12:17	18	MR. GAVENMAN: Objection, form.	12:19
19	transcript of the entire thing so you would know what	12:17	19	THE WITNESS: August of 2017? No.	12:19
20	he's talking about.	12:17	20	BY MR. GREIM:	12:19
21	Q. Well, is this based on what you have	12:17	21	Q. And do you know that he did not have	12:19
22	heard or what you see later in the transcript?	12:17	22	contacts with the Chinese Government after August of	12:19
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1	A. I heard.	12:17	1	2017?	12:19
2	Q. Okay. So --	12:17	2	MR. GAVENMAN: Objection.	12:19
3	A. Just now.	12:17	3	MR. GRENDI: Objection.	12:19
4	Q. I'm sorry. Tell us. What did he say?	12:17	4	THE WITNESS: I don't have any knowledge	12:19
5	A. He said --	12:17	5	whether he has or have not.	12:19
6	MR. GRENDI: Objection. I just want to --	12:17	6	BY MR. GREIM:	12:19
7	hold on. I want to go the record. He didn't listen	12:17	7	Q. Do you know whether it's true that Mr.	12:19
8	to the whole video. So he's testifying as to what he	12:17	8	Guo has been unable to move money from Hong Kong	12:19
9	heard so far in the video.	12:17	9	after he began speaking out as a dissident?	12:19
10	MR. GREIM: I agree. I agree.	12:17	10	MR. GAVENMAN: Objection.	12:20
11	THE WITNESS: Yeah. Just the beginning part,	12:17	11	MR. GRENDI: Objection.	12:20
12	he specifically -- the interview -- the reporter	12:17	12	MR. GAVENMAN: Form and asked and answered,	12:20
13	asked him what instruction they give you. He	12:17	13	I'm fairly certain.	12:20
14	explained, basically, don't expose, you know, the	12:17	14	You can answer, but it's been asked before.	12:20
15	high-ranking government officials', you know,	12:17	15	THE WITNESS: Okay. I don't have that	12:20
16	corruption and don't use her Twitter, expose the	12:17	16	knowledge.	12:20
17	dirt.	12:18	17	BY MR. GREIM:	12:20
18	That's basically it. That's the instruction.	12:18	18	Q. Have you advised Mr. Guo on any	12:20
19	BY MR. GREIM:	12:18	19	statements that he or his attorney has made in the	12:20
20	Q. And do you know when Guo Wengui last	12:18	20	press about this case?	12:20
21	exposed dirt on a high-ranking public officials?	12:18	21	A. About this particular case, no.	12:20
22	MR. GAVENMAN: Objection.	12:18	22	MR. GRENDI: Objection.	12:20
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1	THE WITNESS: And except at the very	12:20	1	A. Yeah.	12:23
2	beginning, I advised him not to go forward with the	12:20	2	Q. -- I'm really referring to either French	12:23
3	lawsuit.	12:20	3	Wallop or Mike Waller. Okay?	12:23
4	BY MR. GREIM:	12:20	4	A. Yes.	12:23
5	Q. Okay. Let's forge ahead. The very --	12:20	5	Q. So did you give them any other cautions	12:23
6	did there come a time when you had a meeting just	12:20	6	about Mr. Guo?	12:23
7	with French Wallop and Mike Waller --	12:20	7	A. I don't recall. I probably did say	12:23
8	A. Uh-huh.	12:20	8	something, yeah, because as I said, I warned on both	12:23
9	Q. -- before Mr. Guo was present?	12:20	9	sides to be cautious as they move forward.	12:23
10	A. I don't have recollection.	12:21	10	Q. Because in October or November of 2017,	12:23
11	Q. Okay. Do you recall --	12:21	11	you had only known Mr. Guo for a few months.	12:23
12	A. We might.	12:21	12	Correct?	12:23
13	Q. Okay. Well, do you recall having a	12:21	13	A. Correct.	12:23
14	meeting with them in order to determine whether you	12:21	14	Q. And at that time, did you have some	12:23
15	felt comfortable connecting Strategic Vision to Mr.	12:21	15	doubt about whether everything he had told you was	12:23
16	Guo?	12:21	16	true?	12:23
17	A. I don't recall that, but I always	12:21	17	MR. GRENDI: Objection to form.	12:23
18	caution all the people I introduce to Miles and	12:21	18	MR. GAVENMAN: Objection.	12:23
19	including Hudson, that Miles, some of what he exposed	12:21	19	THE WITNESS: I do have some doubt, but I	12:23
20	is verified. Some is not verified and comes from the	12:21	20	think what he's done, the whistle-blowing, is very	12:24
21	Chinese, you know, communist system and you never	12:21	21	significant, is very disruptive to Chinese Communist	12:24
22	know, you know, what to expect.	12:21	22	regime. So based on that, I was there to help.	12:24
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1	I did caution them. At the same time, I also	12:21	1	BY MR. GREIM:	12:24
2	cautioned Miles. I have never deal with Mike French	12:22	2	Q. And that was your state of mind at the	12:24
3	in a business transaction. So I didn't know if they	12:22	3	time you introduced Mr. Guo to Strategic Vision?	12:24
4	are -- you know, they can do whatever they can do.	12:22	4	A. Correct.	12:24
5	So I warned both sides.	12:22	5	Q. Did you convey that -- did you convey	12:24
6	Q. And just so the testimony is clear, at	12:22	6	those thoughts to Strategic Vision?	12:24
7	the beginning of your answer, did you say that Mr.	12:22	7	MR. GRENDI: Objection to form.	12:24
8	Guo came from the Chinese Communist system?	12:22	8	MR. GAVENMAN: Objection.	12:24
9	MR. GRENDI: Objection.	12:22	9	THE WITNESS: I think I did, because I said	12:24
10	MR. GAVENMAN: Objection.	12:22	10	some of what he said is not verifiable. You cannot	12:24
11	THE WITNESS: Come from -- everybody in China	12:22	11	verify it at the time and some, indeed, has been	12:24
12	comes out of the rule, the system of the CCP. That's	12:22	12	verified like HNA.	12:24
13	my meaning.	12:22	13	BY MR.	12:24
14	BY MR. GREIM:	12:22	14	Q. Did they include his attendance at the	12:24
15	Q. Did you give Strategic Vision -- and by	12:22	15	Tieneman Square massacre?	12:24
16	the way, when I say Strategic Vision --	12:22	16	MR. GRENDI: Objection.	12:24
17	A. I don't want to see your message.	12:22	17	MR. GAVENMAN: Objection, form, privilege,	12:24
18	Q. Oh, you're right. You get to see	12:23	18	we've established. He's not answering that question.	12:25
19	everything here.	12:23	19	THE WITNESS: I'm not answering that	12:25
20	[Witness views computer screen.]	12:23	20	question, yeah.	12:25
21	BY MR. GREIM:	12:23	21	BY MR. GREIM:	12:25
22	Q. When I say Strategic Vision --	12:23	22	Q. Did you advise Strategic Vision that it	12:25
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1	should obtain a deposit from Mr. Guo?	12:25	1	think he read it, because his English was not good at	12:27
2	MR. GRENDI: Objection.	12:25	2	the time.	12:27
3	THE WITNESS: I don't recall that. I might.	12:25	3	Q. So you didn't translate it for him?	12:27
4	I might have.	12:25	4	A. No.	12:27
5	BY MR. GREIM:	12:25	5	Q. Do you recall what Strategic Vision's	12:27
6	Q. At that point, by, let's say, November	12:25	6	initial proposal was?	12:28
7	of 2017, were you aware of concerns with Mr. Guo not	12:25	7	A. I didn't remember, but I think mostly	12:28
8	paying everyone he had hired to do specific tasks?	12:25	8	it's how to help him, media strategy, communication	12:28
9	MR. GRENDI: Objection.	12:25	9	strategy, that sort of thing.	12:28
10	MR. GAVENMAN: Objection.	12:25	10	Q. Okay. Do you remember where that	12:28
11	THE WITNESS: No.	12:25	11	meeting was? I know your memory is not good of the	12:28
12	BY MR. GREIM:	12:25	12	very first meeting, but do you remember where you	12:28
13	Q. So other than your statement about Mr.	12:25	13	would have met French and Michael?	12:28
14	Guo, what did you -- what, if anything, did you tell	12:26	14	A. I don't know where that meeting, the	12:28
15	Strategic Vision about potential projects for Guo?	12:26	15	first meeting, I met with them, whether it was before	12:28
16	A. Say that again.	12:26	16	we go to New York or, you know, we met in New York.	12:28
17	Q. Let me just -- it was a confusing	12:26	17	So but definitely, the first -- the meeting we had, I	12:28
18	question.	12:26	18	remember is in New York, the apartment of Miles Kwok.	12:28
19	In your very first meeting with Strategic	12:26	19	Q. Was it around Thanksgiving?	12:29
20	Vision --	12:26	20	A. It's November, yeah, during the time. I	12:29
21	A. Yeah.	12:26	21	don't know if it's, you know, Thanksgiving or close	12:29
22	Q. -- what, if anything, did you tell	12:26	22	to Thanksgiving.	12:29
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1	Strategic Vision about projects that Guo needed done?	12:26	1	MR. GREIM: All right. It is now about	12:29
2	A. I don't remember exactly the first	12:26	2	12:30. Why don't we -- I know we just took a break	12:29
3	meeting, what we discussed. I think the idea come to	12:26	3	about an hour ago. So why don't we take another	12:29
4	me to investigate through some conventional way, that	12:26	4	break for lunch. Let's make it like 45 minutes and	12:29
5	was later, probably later on, not the first meeting.	12:26	5	then we'll come back and just march through the	12:29
6	The first meeting was focused on how they can help	12:27	6	documents.	12:29
7	the communication, the P.R., but I don't remember	12:27	7	Does that make sense?	12:29
8	exactly when, you know.	12:27	8	MR. GAVENMAN: Sounds good.	12:29
9	Q. Did Strategic Vision bring any documents	12:27	9	MR. GREIM: Okay. Very good.	12:29
10	to that first meeting?	12:27	10	VIDEOGRAPHER: Going off the record. The	12:29
11	A. Yes. There is a proposal that I	12:27	11	time is now 12:31 p.m.	12:29
12	obtained pre -- before the meeting.	12:27	12	[Whereupon, at 12:31 p.m., a lunch recess was	12:29
13	Q. Okay.	12:27	13	taken, to reconvene at 1:15 p.m. this same day.]	12:29
14	A. To offer their services, specific	12:27	14		
15	services.	12:27	15		
16	Q. Did you share that proposal with Mr.	12:27	16		
17	Guo?	12:27	17		
18	A. I think I did.	12:27	18		
19	Q. Did you share it with Mr. Gertz?	12:27	19		
20	A. It had come from Gertz.	12:27	20		
21	Q. Okay.	12:27	21		
22	A. And I forwarded it to Miles. I don't	12:27	22		
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1	AFTERNOON SESSION	12:29	1	not being forced to leave and lay out his long-term	13:23
2	VIDEOGRAPHER: We are back on the record.	13:20	2	objectives of guiding historic change in his	13:23
3	The time is now 1:22 p.m.	13:20	3	homeland. Did I read that right?	13:23
4	MR. GREIM: Let the record reflect the thumb	13:20	4	A. Yes.	13:23
5	drive from which I played two video clips that the	13:21	5	Q. And are those the objectives that, even	13:23
6	witness viewed has been marked as Han Exhibit 7.	13:21	6	apart from the Strategic Vision work, you were trying	13:23
7	We'll just keep this with the original exhibits, for	13:21	7	to advise Mr. Guo on?	13:23
8	now at least.	13:21	8	MR. GRENDI: Objection.	13:23
9	[Han Exhibit No. 7 was	13:21	9	MR. GAVENMAN: Objection.	13:23
10	marked for identification.]	13:21	10	THE WITNESS: Yes.	13:23
11	FURTHER EXAMINATION BY COUNSEL FOR	13:21	11	BY MR. GREIM:	13:23
12	DEFENDANT/COUNTERCLAIM PLAINTIFF	13:21	12	Q. Now, did you translate for Mr. Guo?	13:23
13	BY MR. GREIM:	13:21	13	A. I don't think so. I gave him a rough	13:24
14	Q. Okay. So, Mr. Han, earlier, we talked	13:21	14	idea about what was proposed.	13:24
15	about a proposal that Strategic Vision had given to	13:21	15	Q. And would you agree with me that most of	13:24
16	Mr. Gertz, who then gave to you. Do you recall that?	13:21	16	this document deals with, for lack of a better word,	13:24
17	A. Yes.	13:21	17	public relations?	13:24
18	MR. GREIM: I'm going to show you what we are	13:21	18	A. Pretty much, yes.	13:24
19	marking as Exhibit 8.	13:21	19	Q. Or maybe, better, it would be public	13:24
20	[Han Exhibit No. 8 was	13:21	20	communications?	13:24
21	marked for identification.]	13:21	21	A. I think it's public image. Also, if you	13:24
22	MR. GREIM: I'm going to ask you take a look	13:21	22	look at the layout, help him to accomplish his	13:24
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1	at that and see if you recognize this document. It's	13:21	1	objectives here, and I would say my perception at the	13:24
2	Bates labeled SVU77 to 79, and the top of the page	13:21	2	beginning is the P.R., you know, strategic P.R.	13:24
3	says "Vision".	13:22	3	Q. What was Mr. Guo's reaction after you	13:24
4	There's also handwriting in the upper	13:22	4	summarized this?	13:24
5	right-hand corner that says "1st Mtg w/Guo".	13:22	5	A. I don't remember specifically what he	13:24
6	[Witness peruses exhibit.]	13:22	6	reacted to it, how he reacted to it. I have no	13:25
7	MR. GRENDI: Can you repeat what the question	13:22	7	recollection.	13:25
8	is?	13:22	8	Q. Well, after you reviewed it, what was	13:25
9	THE WITNESS: Did you ask me a question?	13:22	9	your reaction to it?	13:25
10	BY MR. GREIM:	13:22	10	A. I think this is, you know, for me, he	13:25
11	Q. All right. So, Mr. -- do you recognize	13:22	11	needs someone to steer him through this media world,	13:25
12	this document, Mr. Han?	13:22	12	focused world. I think he needs someone to help him.	13:25
13	A. Yeah. It looks like the original. Yes.	13:23	13	You know, that's just my understanding. I	13:25
14	Q. And I'll just ask you, if look at the	13:23	14	think this is perfect for him as well.	13:25
15	very first paragraph, it says: "This is a vision	13:23	15	Q. At this point in time, did Mr. Guo have	13:25
16	from Mr. G."	13:23	16	Guo Media yet?	13:25
17	Is that Mr. Guo?	13:23	17	A. No.	13:25
18	A. Yes.	13:23	18	MR. GRENDI: Objection.	13:25
19	Q. "To remain safely in this country and	13:23	19	MR. GAVENMAN: Objection.	13:25
20	accomplish his mission back home."	13:23	20	THE WITNESS: No.	13:25
21	And then it presents a three-year roadmap to	13:23	21	BY MR. GREIM:	13:25
22	enable him to accomplish his immediate objectives of	13:23	22	Q. Have you heard of something called Guo	13:25
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1	Media?	13:25	1	A. Yes.	13:29
2	A. No.	13:25	2	Q. And then it mentions a Washington	13:29
3	Q. Oh. You've never heard of that?	13:25	3	residence to show purpose and power and provide	13:29
4	A. I heard of Guo Media, yeah.	13:26	4	hospitality?	13:29
5	Q. What is it?	13:26	5	A. Yes.	13:29
6	A. That's his, Miles, his media platform, I	13:26	6	Q. Now, do you recall being involved in	13:29
7	think probably set up in 2018.	13:26	7	discussions between Strategic Vision and Mr. Guo	13:29
8	Q. Would it surprise you to learn that Mr.	13:26	8	about Washington, a Washington residence?	13:29
9	Guo doesn't know who owns Guo Media?	13:26	9	A. I think so. I remember that.	13:29
10	MR. GAVENMAN: Objection.	13:26	10	Q. And do you recall, in fact, Mr. Guo	13:29
11	MR. GRENDI: Objection.	13:26	11	talking to Strategic Vision about real estate	13:29
12	THE WITNESS: Nothing surprises me anymore.	13:26	12	purchases both in Washington and in New York?	13:29
13	MR. GREIM: All right. I'm now going to hand	13:26	13	MR. GRENDI: Objection.	13:29
14	you what's marked as Han Exhibit 9.	13:26	14	THE WITNESS: Yes. I think so.	13:29
15	[Han Exhibit No. 9 was	13:26	15	BY MR. GREIM:	13:29
16	marked for identification.]	13:26	16	Q. For example, do you recall that they	13:29
17	MR. GREIM: Sorry, guys. I'm just handing	13:26	17	discussed even buying the former home of David	13:29
18	them over across for your own internal distribution.	13:26	18	Rockefeller in New York?	13:29
19	MR. GRENDI: That's fine.	13:26	19	A. I didn't remember who initiated it, but	13:30
20	MR. GREIM: You'll see this is a four-page	13:26	20	I think there is such a discussion.	13:30
21	document Bates labeled SVUS000080 to 83, and it says	13:26	21	Q. And were the discussions about real	13:30
22	"Three-Year Timeline at the top. Please take a	13:27	22	estate and offices mixed in with the discussions	13:30
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1	second to review it, Mr. Han.	13:27	1	about public campaign?	13:30
2	[Witness peruses exhibit.]	13:27	2	MR. GAVENMAN: Objection, form.	13:30
3	THE WITNESS: Yeah.	13:28	3	MR. GRENDI: Objection.	13:30
4	BY MR. GREIM:	13:28	4	THE WITNESS: Yeah. It's hard for me to	13:30
5	Q. Have you seen this document before?	13:28	5	remember exactly. I think maybe they were separate	13:30
6	A. I might have. I have some recollection,	13:28	6	times or they were all together, yeah. Because it's	13:30
7	but it's not as clear as this one.	13:28	7	part of the package, it might have yeah, more likely.	13:30
8	Q. Well, if you look at the strategic	13:28	8	BY MR. GREIM:	13:30
9	objectives in the very beginning, the five bullet	13:28	9	Q. Okay. So they were discussed at the	13:30
10	points, while there are five bullet points, do they	13:28	10	same time?	13:30
11	seem similar to the objectives identified in Exhibit	13:28	11	MR. GRENDI: Objection.	13:30
12	8?	13:28	12	THE WITNESS: You know, sometimes when you	13:30
13	MR. GRENDI: Objection.	13:28	13	talk about real estate, I think they're purely	13:30
14	MR. GAVENMAN: Objection.	13:29	14	focused on real estate and not mentioned about some	13:30
15	THE WITNESS: Yeah.	13:29	15	other part. I mean, just sometimes, that might be	13:30
16	BY MR. GREIM:	13:29	16	mixed. So I don't recall specific events.	13:30
17	Q. And you'll see down under "Personal	13:29	17	BY MR. GREIM:	13:31
18	Presence", it says: "Create a personal presence in	13:29	18	Q. It's hard to generalize?	13:31
19	Washington."	13:29	19	A. Correct.	13:31
20	And then it goes on. Do you see that?	13:29	20	Q. Okay. Now, if you notice, in these four	13:31
21	A. Yes.	13:29	21	pages, there's still no discussion of a research	13:31
22	Q. On the very first page?	13:29	22	project. Do you agree with me?	13:31
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1	A. Correct.	13:31	1	A. No. It was purely my responsibility.	13:34
2	Q. So let me ask you do you recall when in	13:31	2	Q. So do you know where -- well, let me	13:34
3	these discussions a research project actually began	13:31	3	back up.	13:34
4	to be discussed?	13:31	4	Do you understand that the initial research	13:34
5	A. I didn't remember, but I know for a fact	13:31	5	was to occur on a set of 15 names?	13:34
6	I was the one who talked Miles into this. I	13:31	6	A. That was the nature, I think,	13:34
7	discussed with Mike and French to initiate this	13:31	7	originally. I don't know what names would be will.	13:34
8	research project.	13:31	8	Q. It was more amorphous at the beginning?	13:34
9	Q. So I'm going to make sure I understand	13:31	9	A. Correct.	13:34
10	your testimony.	13:31	10	MR. GRENDI: Objection.	13:34
11	A. Yes.	13:31	11	MR. GREIM: Well, let's see. I'm going to	13:34
12	Q. You -- did the research -- was the	13:31	12	now show you what we're going to mark as Exhibit 10.	13:34
13	research project discussed between you and French and	13:32	13	[Han Exhibit No. 10 was	13:34
14	Mike before it was discussed with Mr. Guo?	13:32	14	marked for identification.]	13:34
15	A. I didn't remember --	13:32	15	MR. GREIM: Wait a minute. This is a set of	13:35
16	MR. GAVENMAN: Form.	13:32	16	texts involving you, and I see -- let me make sure I	13:35
17	THE WITNESS: -- which comes first, but I	13:32	17	didn't --	13:35
18	come up with the idea, I believe to continue to	13:32	18	MR. GRENDI: You've got notes on one of them?	13:35
19	disrupt the Communist regime, we need sustainable	13:32	19	MR. GREIM: I thought I did. Maybe not.	13:35
20	fact-based, evidence-based exposure of Chinese	13:32	20	Maybe I don't.	13:35
21	corruption. So I thought, you know, this project	13:32	21	MR. GRENDI: Just for the record, this is the	13:35
22	could fill into that and I discussed with -- I don't	13:32	22	document you produced to me last night, you produced	13:35
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1	know who I discussed first, because I didn't know	13:32	1	to Eastern Profit last night?	13:35
2	there -- first, I think maybe I discussed with Mike	13:32	2	THE WITNESS: Correct. This is a -- these	13:35
3	and French whether they have the capability to do	13:32	3	are Bates numbered SVUS001842 to 1903 and they began	13:35
4	this, because in our conversation about these two	13:32	4	in November 12, 2017 and they go to July 15, 2018.	13:36
5	projects or, I mean, these two proposals, I	13:32	5	MR. GAVENMAN: Do you have a copy for me?	13:36
6	mentioned, I asked -- you know, they talked about	13:33	6	MR. GREIM: Unfortunately, I only have three	13:36
7	their accreditation for doing stuff for government,	13:33	7	copies. I was thinking there was something wrong	13:36
8	for contracts, for some other issues. I felt maybe I	13:33	8	here. So if you don't mind, if you guys can share.	13:36
9	asked them whether they have the capability to do	13:33	9	I'm sorry. I'm missing one copy of that set.	13:36
10	this type of research, and they gave me -- you know,	13:33	10	I hope that's not going to be the case for -- I've	13:36
11	they confirmed that they could have.	13:33	11	got other -- for some reason, we're missing one copy.	13:36
12	So I went back to Miles and said why don't we	13:33	12	I know what happened. I know what happened.	13:36
13	expand this proposal, do some research on those	13:33	13	[Discussion held off the record.]	13:37
14	corrupt officials; once we have solid evidence, we	13:33	14	MR. GREIM: This is the only one like this.	13:37
15	can expose them. So that's how it started.	13:33	15	So I'm sorry, everybody.	13:37
16	Q. Now, when you made this proposal to Mr.	13:33	16	BY MR. GREIM:	13:37
17	Guo, did you have in mind yet which officials should	13:33	17	Q. Okay. So I will represent to you that	13:37
18	be targeted?	13:33	18	this is a compendium of your texts with French Wallop	13:37
19	A. No, but I was -- mainly, I think we	13:33	19	and you'll see that they begin on November 12th.	13:37
20	understand the top officials.	13:33	20	A. Yes.	13:37
21	Q. Okay. By the way, did Mr. Gertz play a	13:34	21	Q. My question for you, by the way, os did	13:37
22	role in coming up with the idea of research?	13:34	22	you first meet French at lunch at her home with Bill	13:37
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1	Gertz before Mr. Waller was there? Do you recall that?	13:38	1	Wallop there is asking that the lunch be pushed back to one?	13:39
2		13:38	2		13:40
3	A. I don't.	13:38	3	A. Um-hum.	13:40
4	Q. Okay. Well, you'll see that you are writing to her on -- in the morning of the 12th and you say: "Hi, French. Great meeting you. I talked with Miles and he's eager to meet you. He wants to invite you to Mar a Lago now, but I think it's better to wait until I come back from Japan."	13:38	4	Q. I'm sorry. I'm sorry. I take that back. You see that you're asking that the lunch be pushed back because Bannon wants an urgent meeting at 11:30?	13:40
5		13:38	5		13:40
6		13:38	6		13:40
7		13:38	7		13:40
8		13:38	8	A. Yes.	13:40
9	And then you're proposing a meeting on the following week, on November the 19th. Do you see that?	13:38	9	Q. And by the way, was it common around this time for Bannon to have, you know, meetings with Mr. Guo?	13:40
10		13:38	10		13:40
11		13:38	11	MR. GAVENMAN: Objection.	13:40
12		13:38	12	MR. GRENDI: Objection.	13:40
13	A. Right.	13:38	13	THE WITNESS: Say that again.	13:40
14	MR. GRENDI: Objection.	13:38	14		13:40
15	BY MR. GREIM:	13:38	15	BY MR. GREIM:	13:40
16	Q. And you mention real estate. Correct?	13:38	16	Q. Was it common around this time for Bannon to have meetings with Mr. Guo?	13:40
17	A. Um-hum.	13:38	17		13:40
18	MR. GRENDI: Objection.	13:38	18	MR. GAVENMAN: Objection.	13:40
19	BY MR. GREIM:	13:38	19	MR. GRENDI: Objection.	13:40
20	Q. And you say: "His priority is the building opposite the Treasury."	13:38	20	THE WITNESS: Common? What do you mean,	13:40
21		13:38	21	common?	13:40
22	A. Um-hum.	13:38	22	BY MR. GREIM:	13:40
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1	Q. Okay. So by this point, do you believe you at least met French Wallop?	13:38	1	Q. Was it a --	13:40
2		13:38	2	A. Common practice?	13:40
3	A. Yeah. I might have.	13:38	3	Q. Yeah. Did it happen on a regular basis?	13:40
4	Q. And you already talked to Mr. Guo about her?	13:38	4	A. No, but Steve Bannon is very	13:40
5		13:38	5	unpredictable. His schedule is always messed up.	13:40
6	A. Yes.	13:38	6	Always, we have to accommodate him. So that's	13:40
7	Q. Let's forge ahead here. Then you see he she wrote you back, your report back about Japan. You say: "Steve Bannon stirred up things here. I am happy."	13:39	7	common.	13:40
8		13:39	8	Q. I see. If you go on now to page 45, you'll see that Ms. Wallop asked that you not disclose their identities to Mr. Bannon.	13:40
9		13:39	9		13:41
10	Did I read that right?	13:39	10	A. Correct.	13:41
11		13:39	11	Q. And you say, in fact, Mr. Guo does not know her name yet.	13:41
12	A. Yes.	13:39	12		13:41
13	Q. Let's continue marching on, and if you look at around November 20th, do you see that you're setting --	13:39	13	A. Correct.	13:41
14		13:39	14	Q. And does that sound right, that you did not disclose her name?	13:41
15		13:39	15		13:41
16	A. Where is the 20th?	13:39	16	A. I didn't, yeah, because French asked me	13:41
17	Q. Oh. It's SVUS001844.	13:39	17	not to mention their names at all. At the early	13:41
18	A. 44?	13:39	18	stage, I didn't. Steve Bannon even didn't know they	13:41
19	Q. Um-hum. You got ahead of us a little bit there.	13:39	19	were going to be in that meeting at one o'clock.	13:41
20		13:39	20		13:41
21	A. Yes.	13:39	21	Q. Okay. Very good. If you -- let's flip ahead now to 1852.	13:41
22	Q. All right. So do you see that French	13:39	22		13:41
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1	A. 52?	13:41	1	A. I think so, but -- yeah. I just don't	13:44
2	Q. Um-hum. We're now into December 3rd.	13:41	2	remember.	13:44
3	A. Yes.	13:41	3	Q. By the way, do people drink alcohol when	13:44
4	Q. Do you see that you are being sent by	13:41	4	meals were served when they met?	13:44
5	Ms. Wallop, it looks like, a Hotel Washington	13:42	5	A. Sometimes they do.	13:44
6	property?	13:42	6	MR. GAVENMAN: Objection, form.	13:44
7	A. Um-hum.	13:42	7	THE WITNESS: Sometimes they don't. Steve, I	13:44
8	Q. Do you remember discussing that	13:42	8	think Steve didn't want to drink.	13:44
9	property?	13:42	9	BY MR. GREIM:	13:44
10	A. No.	13:42	10	Q. Forget about -- I'm sorry. I don't mean	13:44
11	Q. All right.	13:42	11	about Steve Bannon. I mean --	13:45
12	A. There's just so many properties being	13:42	12	A. In general?	13:45
13	discussed.	13:42	13	Q. -- when Strategic Vision met with Mr.	13:45
14	Q. Okay. Do you remember at this time -- I	13:42	14	Guo.	13:45
15	know there's not a lot of detail in these texts, but	13:43	15	MR. GAVENMAN: Objection.	13:45
16	do you remember whether the idea of a research	13:43	16	THE WITNESS: I think I remember there was	13:45
17	project had begun to be discussed by early December?	13:43	17	served alcohol, wine.	13:45
18	A. I don't think so, not in this meeting.	13:43	18	BY MR. GREIM:	13:45
19	Q. Okay.	13:43	19	Q. Okay. Did Mr. Guo have alcohol in these	13:45
20	A. Because we just set up a preliminary	13:43	20	meetings?	13:45
21	meeting, first meeting.	13:43	21	MR. GAVENMAN: Objection.	13:45
22	Q. Okay. And did it appear to you based on	13:43	22	THE WITNESS: He had some.	13:45
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1	the earlier text that maybe the very initial meeting,	13:43	1	BY MR. GREIM:	13:45
2	at least involving you and Strategic Vision, would	13:43	2	Q. What do you remember being discussed at	13:45
3	have been around Thanksgiving, in late November?	13:43	3	the very first meeting?	13:45
4	A. Yeah. About that time, yeah. I just	13:43	4	A. Very little. I think it was more around	13:45
5	don't know exactly. I would say -- did I mention	13:43	5	like the projects here, the vision stuff.	13:45
6	here 17, that Bannon meeting? That's the date they	13:43	6	Q. If you could skip to page 1854.	13:45
7	first met, I think.	13:43	7	A. 54?	13:45
8	Remember here, where it says Bannon had a	13:43	8	Q. Yeah. Actually, it's a few pages back	13:45
9	meeting at 11:30, that pushed back to one o'clock?	13:43	9	from where we were. I'm just trying to pin down	13:45
10	Q. Oh, right.	13:44	10	other dates of meetings.	13:45
11	A. So that day should be their first	13:44	11	A. Okay.	13:45
12	meeting.	13:44	12	Q. And it looks like there's going to be a	13:45
13	Q. I see. So does it look to you like that	13:44	13	meeting that day in New York City.	13:46
14	was November 20th?	13:44	14	A. On December 9?	13:46
15	A. Yes. So that's the first meeting they	13:44	15	Q. Correct.	13:46
16	actually met in person.	13:44	16	A. Um-hum.	13:46
17	Q. And you were there for that meeting?	13:44	17	Q. So do you believe -- this is clearly the	13:46
18	A. Yes. I was there with Steve Bannon and	13:44	18	second meeting, maybe the third meeting. Do you	13:46
19	then with them.	13:44	19	recall?	13:46
20	Q. Then after Bannon left, they came in?	13:44	20	MR. GRENDI: Objection.	13:46
21	A. Yes.	13:44	21	THE WITNESS: That, I don't remember exactly.	13:46
22	Q. Was a meal served?	13:44	22	The first, this is definitely not the first, but I	13:46
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1	don't know if it's the second or third or fourth.	13:46	1	Q. Okay. So you don't remember checking	13:49
2	That, I'm not sure.	13:46	2	names, checking other contacts that she provided to	13:49
3	BY MR. GREIM:	13:46	3	Mr. Guo?	13:49
4	Q. By the way, does Ms. Wallop tend to use	13:46	4	A. No.	13:49
5	emoticons in her text?	13:46	5	Q. You don't?	13:49
6	A. Say that again.	13:46	6	A. No.	13:49
7	Q. Does Ms. Wallop tend to use emoticons in	13:46	7	Q. Do you know if Mr. Guo, if he checked	13:49
8	her texts?	13:46	8	the names?	13:49
9	A. Emoticons is like an emoji?	13:46	9	A. I have no idea.	13:49
10	Q. Emojis, yes.	13:46	10	Q. But does this indicate to you that as of	13:49
11	Emoticons, is that even a word? I think I	13:46	11	mid-December, the parties are still very much in	13:49
12	meant emojis. I don't even know what an emoticon is.	13:46	12	discussions?	13:49
13	A. Yeah.	13:46	13	A. Correct.	13:49
14	Q. Okay. If you see -- now let's go ahead	13:46	14	Q. Okay.	13:49
15	now and turn to 1858.	13:47	15	MR. GRENDI: For the record, just wait for	13:49
16	A. 58.	13:47	16	him to finish the question.	13:49
17	Q. And December 16th, there's the long	13:47	17	THE WITNESS: Okay.	13:49
18	series of texts that runs from the 16th to the 17th.	13:47	18	BY MR. GREIM:	13:50
19	You're advising that you landed back from a trip and	13:47	19	Q. On the next page, in white, you respond	13:50
20	there's a -- do you see in green? Is that commentary	13:47	20	to this text from Ms. Wallop. She asked how your day	13:50
21	from Ms. Wallop?	13:47	21	went and you say "not good".	13:50
22	A. Yeah.	13:47	22	A. Yes.	13:50
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1	Q. Okay. Let's skip ahead. Do you see on	13:47	1	Q. What -- I don't understand. What is --	13:50
2	the next page -- this is now 1859 -- at the top, Ms.	13:47	2	what are you talking about in that text, if you can	13:50
3	Wallop says: "By the way, when your M asked for	13:47	3	recall?	13:50
4	names elsewhere, I gave him a mini list, not the real	13:48	4	A. Yeah. I didn't know exactly what was --	13:50
5	list."	13:48	5	I think I had a fight with Steve Bannon, but I didn't	13:50
6	A. We're on 58?	13:48	6	know -- I didn't remember exactly what it was about.	13:50
7	Q. I'm sorry. We're on 59 now. We moved,	13:48	7	Q. Okay. Let's continue on with the string	13:50
8	the same text.	13:48	8	here. You see now, moving into page 1861 from 1860,	13:50
9	A. "By the way". Okay. Yeah.	13:48	9	we are now under the heading December 18, 2017 and	13:51
10	[Witness peruses exhibit.]	13:48	10	Ms. Wallop says: "Safe journey back, please."	13:51
11	BY MR. GREIM:	13:48	11	And you respond: "Great meeting with our	13:51
12	Q. Do you know whether you or Mr. Guo ever	13:48	12	friend. He is coming in two weeks to Washington."	13:51
13	followed up to check with any of these contacts?	13:48	13	Do you see that?	13:51
14	MR. GAVENMAN: Objection, form.	13:48	14	A. Yes.	13:51
15	THE WITNESS: I have no idea.	13:48	15	Q. Do you know who you were referring to	13:51
16	[Interruption.]	13:48	16	there?	13:51
17	BY MR. GREIM:	13:48	17	A. I think it's, perhaps, Miles. I'm just	13:51
18	Q. My question was -- well, first of all,	13:49	18	speculating. Maybe he came to Washington to look at	13:51
19	let's back up.	13:49	19	houses.	13:51
20	Do you remember getting a list of references	13:49	20	Q. Okay. Did he come to Washington at some	13:51
21	from French Wallop?	13:49	21	point to look at houses?	13:51
22	A. No.	13:49	22	A. I think he did, yes. At least I	13:51
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<p>1 remember once. 13:51</p> <p>2 Q. Okay. It looks like on the 19th, the 13:51</p> <p>3 discussion continues here. She says: "Just checked 13:52</p> <p>4 with M and after three is fine for him as well." 13:52</p> <p>5 On the 20th, she checks again. Do you recall 13:52</p> <p>6 having another meeting, setting up another meeting 13:52</p> <p>7 with Mr. Guo and Wallop and Waller? If you need to 13:52</p> <p>8 page forward or backward in this to help yourself, 13:52</p> <p>9 please do. 13:52</p> <p>10 A. Page 4? Oh. I think that trip, most 13:52</p> <p>11 likely, was looking for real estate in Washington. 13:52</p> <p>12 Q. Let's move to December 21. 13:53</p> <p>13 A. 21, okay. 13:53</p> <p>14 Q. There, you say: "Our friend from Tokyo 13:53</p> <p>15 wants to know when is earliest he can come to meet." 13:53</p> <p>16 A. Wants to know when is the earliest that 13:53</p> <p>17 he can come to meet. 13:53</p> <p>18 Q. Is this referring to Mr. Guo or a 13:53</p> <p>19 different person? 13:53</p> <p>20 A. It's a different person. 13:53</p> <p>21 Q. So were you working with Strategic 13:53</p> <p>22 Vision on a different potential client? 13:53</p> <p style="text-align: right;">Page 154</p>	<p>1 A. Yes. 13:54</p> <p>2 Q. French Wallop says: "Hi there. Were 13:54</p> <p>3 you able to set a time to visit New York? I know you 13:54</p> <p>4 will let us know as the conversation unfolds." 13:54</p> <p>5 And then if you continue to page 1864, there's 13:54</p> <p>6 your response. You say: "Not yet. He is 13:54</p> <p>7 incommunicado." 13:54</p> <p>8 Then you say: "Our Japan friend arrives on 13:54</p> <p>9 the 2nd." 13:54</p> <p>10 Do you see that? 13:55</p> <p>11 A. Yes. 13:55</p> <p>12 Q. So was there a time in mid-December when 13:55</p> <p>13 Mr. Guo sort of stopped conferring with you about 13:55</p> <p>14 this matter? 13:55</p> <p>15 MR. GAVENMAN: Objection, form. 13:55</p> <p>16 MR. GRENDI: Objection. 13:55</p> <p>17 THE WITNESS: I don't think specifically on 13:55</p> <p>18 this matter. Just he's not reachable at the time. 13:55</p> <p>19 BY MR. GREIM: 13:55</p> <p>20 Q. Okay. If you go down to December 24th, 13:55</p> <p>21 you have another followup to Ms. Wallop. You say: 13:55</p> <p>22 "I talked with him and he says he wants to do it, but 13:55</p> <p style="text-align: right;">Page 156</p>
<p>1 A. Yes. 13:53</p> <p>2 Q. And might that have been the person that 13:53</p> <p>3 you're referring to back on the previous page, 1862? 13:53</p> <p>4 A. 1862? 13:53</p> <p>5 MR. GRENDI: Objection. 13:53</p> <p>6 MR. GAVENMAN: Objection. 13:53</p> <p>7 BY MR. GREIM: 13:53</p> <p>8 Q. I'm sorry. 1861. 13:53</p> <p>9 A. Oh, yeah. It could be that person. So 13:53</p> <p>10 yeah. 13:53</p> <p>11 Q. It could have been the Tokyo person? 13:54</p> <p>12 A. It could have been the Tokyo person, not 13:54</p> <p>13 Miles. It's just very confusing. Yeah. 13:54</p> <p>14 Q. So throughout this string, are you kind 13:54</p> <p>15 of talking about both matters at once? 13:54</p> <p>16 A. Yes. 13:54</p> <p>17 Q. The Guo and the Tokyo matter? 13:54</p> <p>18 A. Yes. They are all mixed. 13:54</p> <p>19 Q. Let's keep going now. 13:54</p> <p>20 A. Yeah. 13:54</p> <p>21 Q. If you could go to the bottom of 1863, 13:54</p> <p>22 December 22, 2017. 13:54</p> <p style="text-align: right;">Page 155</p>	<p>1 would like to put a clause in the contract which says 13:55</p> <p>2 if you failed to provide the deliverables as defined 13:55</p> <p>3 in the scope, you should return the deposit. What do 13:55</p> <p>4 you think?" 13:55</p> <p>5 Do you see that? 13:55</p> <p>6 A. Yes. 13:55</p> <p>7 Q. Now, were you conveying a message from 13:55</p> <p>8 Mr. Guo there? 13:55</p> <p>9 A. Yes. 13:55</p> <p>10 Q. And so by December 24th, were 13:55</p> <p>11 discussions far enough along that you had already 13:55</p> <p>12 begun discussing the actual research project at 13:55</p> <p>13 issue? 13:55</p> <p>14 A. Correct. 13:55</p> <p>15 Q. Okay. Then if you go on, you can see 13:56</p> <p>16 Ms. Wallop's response actually consumes the rest of 13:56</p> <p>17 1864 through 1866. If you could, could you take a 13:56</p> <p>18 second to review that, sir. 13:56</p> <p>19 A. Um-hum. 13:56</p> <p>20 [Witness peruses exhibit.] 13:56</p> <p>21 THE WITNESS: Yeah. 13:56</p> <p>22 BY MR. GREIM: 13:57</p> <p style="text-align: right;">Page 157</p>

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1	Q. Okay. Do you recall this conversation?	13:57	1	my understanding is he doesn't want me to sign it.	13:59
2	A. Yes. Now, I remember, yes.	13:57	2	Q. Guo does not want you to sign it?	13:59
3	Q. And you recall that Ms. Wallop did not	13:57	3	A. No. He does not.	13:59
4	want to agree to return of the deposit. Correct?	13:57	4	Q. Let me back up for a second here before	13:59
5	A. Um-hum.	13:57	5	we go further.	13:59
6	Q. You also see she references that you,	13:57	6	A. Yeah.	13:59
7	yourself, would be on the hook, because as of this	13:57	7	Q. We can stop looking at those texts for a	13:59
8	time, she understood that you were going to sign the	13:57	8	second.	13:59
9	contract. Do you see that part?	13:57	9	A. That's okay.	13:59
10	MR. GRENDI: Objection.	13:57	10	Q. What was your role here? Did you see	13:59
11	THE WITNESS: "We will have entered -- which	13:57	11	yourself as an intermediary between the two sides or	13:59
12	part?	13:58	12	as a representative of Guo?	13:59
13	BY MR. GREIM:	13:58	13	A. I think I'm a person to facilitate this	13:59
14	Q. Really, it's sort of at the bottom of	13:58	14	project. I am friend on both sides. I have no	14:00
15	1865 into 1866. Do you see it says -- at the very	13:58	15	financial interest in there.	14:00
16	bottom of 65, it says: "Since he wants you to sign."	13:58	16	My entire thing is driven by the political	14:00
17	A. Yeah.	13:58	17	agenda. So I just want to get the things done, you	14:00
18	Q. "And, therefore, be responsible for	13:58	18	know, achieve what we said we're going to do. That's	14:00
19	payments, that is also very complex and unfair to	13:58	19	it.	14:00
20	you."	13:58	20	Q. By the way, during this period, did Guo	14:00
21	A. Right. What's the question?	13:58	21	approach you and ask you to work for him full time?	14:00
22	Q. Well, do you recall that at some point,	13:58	22	MR. GAVENMAN: Objection to form.	14:00
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1	you were going to be the person to sign the	13:58	1	THE WITNESS: He did. I don't know when.	14:00
2	agreement?	13:58	2	BY MR. GREIM:	14:00
3	A. It wasn't that clear at the time who's	13:58	3	Q. And what was your response?	14:00
4	going to sign, because, obviously, I didn't want to	13:58	4	A. I thought I said I have to think about	14:00
5	get in the middle. That was my intention from the	13:58	5	it, but it's probably, I think way before this,	14:00
6	very beginning.	13:58	6	before the project.	14:00
7	Q. Well, where did the idea of you signing	13:58	7	Q. You don't recall telling Mr. Waller or	14:00
8	come from? Was it suggested by someone?	13:58	8	Ms. Wallop right around the time of the project that	14:01
9	A. I think French wants me to sign that as	13:58	9	Mr. Guo had made the suggestion to you and you were	14:01
10	go-between so I can communicate better with them and	13:58	10	considering it?	14:01
11	with Miles. That's my recollection.	13:59	11	A. I think --	14:01
12	Q. Okay. Now, why wouldn't Guo just sign	13:59	12	MR. GAVENMAN: Objection to form.	14:01
13	it himself?	13:59	13	THE WITNESS: I didn't remember if I	14:01
14	A. That, I don't know.	13:59	14	mentioned it. I probably did, but I didn't recall	14:01
15	Q. Did Guo not want to sign it himself?	13:59	15	the time and the contents -- the context.	14:01
16	MR. GAVENMAN: Objection.	13:59	16	BY MR. GREIM:	14:01
17	MR. GRENDI: Objection.	13:59	17	Q. Did there come a time when you	14:01
18	THE WITNESS: I have no idea.	13:59	18	ultimately told Mr. Guo that you wouldn't do it?	14:01
19	BY MR. GREIM:	13:59	19	MR. GAVENMAN: Objection to form.	14:01
20	Q. Well, did you discuss it with him?	13:59	20	THE WITNESS: I never made a specific -- we	14:01
21	A. No. We hadn't got -- you know, who is	13:59	21	just leave it at that.	14:01
22	going to sign, I think we have not got that far, but	13:59	22	BY MR. GREIM:	14:01
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1	Q. Well, after this time, did he ever come	14:01	1	officials, Wang Qishan, nephew -- not nephew --	14:03
2	back to you again and say he would like you to work	14:01	2	niece's E-mail account or bank account -- I forgot --	14:04
3	for him exclusively?	14:01	3	something to that effect. Yeah.	14:04
4	A. What do you mean, after this?	14:01	4	Q. And did they represent to you that they	14:04
5	Q. Well, let's say after December of 2017.	14:01	5	had done anything illegal?	14:04
6	A. 2017? I think we haven't discussed	14:01	6	A. Well, first of all, I cannot verify that	14:04
7	since. I didn't see anything at all. I didn't	14:02	7	is the real bank account or information. I just saw	14:04
8	respond, confirm or deny or reject. He never	14:02	8	the screen shot and there's a -- you know, it showed	14:04
9	mentioned it again.	14:02	9	the person's name and stuff, and so I didn't, you	14:04
10	Q. Do you remember a moment when Ms. Wallop	14:02	10	know, register anything of that thought.	14:04
11	called you to come over to her apartment --	14:02	11	Q. Sure. And my question is not what you	14:04
12	A. Yes.	14:02	12	think determined. It's did they represent to you	14:04
13	Q. -- late at night and look at something?	14:02	13	that they had done anything illegal in pulling up the	14:04
14	MR. GAVENMAN: Objection to form.	14:02	14	information?	14:04
15	THE WITNESS: There is some time, I think she	14:02	15	A. I didn't know, because we discussed	14:04
16	called me to come to her house.	14:02	16	about how to do it legally, and I think this was	14:05
17	BY MR. GREIM:	14:02	17	during the project formation of what we needed to be	14:05
18	Q. And what was the purpose of that visit?	14:02	18	done, how to not violate law in this country and go	14:05
19	MR. GAVENMAN: Objection to form.	14:02	19	outside of the country and do stuff that the other	14:05
20	THE WITNESS: I think -- I don't specifically	14:02	20	country might be legally obtained, this information.	14:05
21	remember. It probably has to do with the project.	14:02	21	Q. What impact did that have on you when	14:05
22	BY MR. GREIM:	14:02	22	you saw what they pulled up on the screen?	14:05
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1	Q. Did it have to do with something that	14:02	1	A. I first thought they have the ability,	14:05
2	she said she could find, some research that she could	14:02	2	the capacity, to dig into the information Miles is	14:05
3	find?	14:02	3	looking for, I was looking for, and if it's, you	14:05
4	A. Research she could find?	14:02	4	know, really real. So that was my first impression.	14:05
5	MR. GRENDI: Objection.	14:02	5	So I told Miles they have the capability to	14:06
6	THE WITNESS: We had so many meetings in her	14:02	6	get the information they needed. I mean we needed.	14:06
7	house. So I don't, you know, specifically recall.	14:03	7	Yeah.	14:06
8	You know, mostly, it relate to the research projects.	14:03	8	Q. Now, do you have any reason to think	14:06
9	BY MR. GREIM:	14:03	9	that what they showed you wasn't real?	14:06
10	Q. Okay. Do you recall her asking you to	14:03	10	A. I don't, because it's hard -- with just	14:06
11	come over so she can show you that she was able to	14:03	11	the one screen shot, it's very hard to say this is	14:06
12	get into a certain bank account on her computer?	14:03	12	the real thing.	14:06
13	A. Yes.	14:03	13	Q. Do you remember anything else they told	14:06
14	MR. GAVENMAN: Objection.	14:03	14	you about the screen shot?	14:06
15	BY MR. GREIM:	14:03	15	A. Yeah. They told me they have a team	14:06
16	Q. All right. And did you come over and	14:03	16	that got into the system and the system, you know, we	14:06
17	view it?	14:03	17	have to be very careful with the team outside of this	14:06
18	A. Yes.	14:03	18	country, and they want to be very careful and track	14:06
19	Q. What did you see?	14:03	19	information, because they can have some trigger	14:06
20	A. I saw -- I think Mike showed me that,	14:03	20	mechanisms, a switch that can turn it off, and then	14:06
21	not French, and, actually, it's a screen shot that	14:03	21	we should monitor the accounts rather than extract	14:07
22	shows one of the Chinese Government high-ranking	14:03	22	the information. I think that's the only thing I	14:07
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1	remember.	14:07	1	their own employees?	14:09
2	Q. Did they actually mention that to you	14:07	2	MR. GAVENMAN: Objection.	14:09
3	repeatedly, that it was important to monitor rather	14:07	3	THE WITNESS: I think they didn't	14:09
4	than, simply, breaking into the accounts?	14:07	4	specifically say that's their employees. They just	14:09
5	MR. GRENDI: Objection. You can answer.	14:07	5	hire contract people to do the work. I think that's	14:09
6	THE WITNESS: Yes.	14:07	6	my recollection.	14:09
7	MR. GRENDI: Sorry.	14:07	7	BY MR. GREIM:	14:09
8	THE WITNESS: Yeah. The emphasis was on that	14:07	8	Q. Let's talk now about the 15 names. We	14:09
9	point.	14:07	9	touched on this just a little bit earlier.	14:09
10	BY MR. GREIM:	14:07	10	A. Yeah.	14:09
11	Q. And was that your understanding of what	14:07	11	Q. Do you remember sitting with Mr. Guo --	14:09
12	they were supposed to be doing under the contract?	14:07	12	A. Yeah.	14:10
13	MR. GAVENMAN: Objection.	14:07	13	Q. -- and Ms. Wallop and Mr. Waller and	14:10
14	MR. GRENDI: Objection.	14:07	14	walking through a packet of the 15 names?	14:10
15	THE WITNESS: Under the contract, I think	14:07	15	MR. GAVENMAN: Objection.	14:10
16	there's specifically -- it says specific information	14:07	16	THE WITNESS: I think, yeah. I think -- I	14:10
17	that, you know, they were looking for and they were	14:07	17	don't know if I were there or Yvette, because at the	14:10
18	supposed to deliver, and I think whether always	14:07	18	very beginning, maybe I was there. We talked about a	14:10
19	monitor or not always monitor and extract at one	14:08	19	fish tank of things, and the names, maybe I learned	14:10
20	time, there's no such specification, you know,	14:08	20	later, because at one point, he didn't want me to get	14:10
21	specific provision in there.	14:08	21	involved.	14:10
22	BY MR. GREIM:	14:08	22	So I didn't know the names at the time.	14:10
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1	Q. So, however, your understanding is not	14:08	1	Basically, I'm saying I'm a little confused about	14:10
2	that the contract required them to break into the	14:08	2	whether I was present when the 15 names presented,	14:10
3	accounts. Correct?	14:08	3	but I learned later on. At least I know who they	14:10
4	MR. GRENDI: Objection.	14:08	4	are.	14:10
5	MR. GAVENMAN: Objection.	14:08	5	BY MR. GREIM:	14:10
6	THE WITNESS: Please rephrase.	14:08	6	Q. All right. By the way, when did -- when	14:10
7	BY MR. GREIM:	14:08	7	exactly did Yvette Wang get involved here?	14:11
8	Q. Sure. Your understanding is not that	14:08	8	A. So when they reached -- when we	14:11
9	the contract required them to break into these	14:08	9	basically negotiated on the project, the contract was	14:11
10	accounts, is it?	14:08	10	pretty done, like how much he's going to pay, who --	14:11
11	MR. GRENDI: Objection.	14:08	11	what the chunk, tranche of information they're going	14:11
12	MR. GAVENMAN: Objection.	14:08	12	to provide, and then we solved the deposit issue.	14:11
13	THE WITNESS: Not necessarily, but the	14:08	13	How we solved it, I didn't remember, and at the time,	14:11
14	discussion, during the discussion, the deliverables	14:08	14	the basic foundation is done. So he said, I don't	14:11
15	made it very clear that three types of -- three or	14:08	15	want you to get involved; so you're out.	14:11
16	four types information that the contract is going to	14:08	16	I didn't know what was going on afterwards,	14:11
17	require. That is including the detailed information	14:08	17	how the contract restructured, because there were	14:11
18	of financial statements, bank account, credit cards,	14:09	18	changes afterward. So I have no idea.	14:11
19	all of that.	14:09	19	Q. Do you recall that Mr. Guo walked away	14:11
20	BY MR. GREIM:	14:09	20	from the project, abandoned it, and a company called	14:12
21	Q. Okay. Did French and Mike tell you that	14:09	21	Eastern Profit came in to take his place?	14:12
22	all of the people working on the project would be	14:09	22	MR. GAVENMAN: Objection.	14:12
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1	MR. GRENDI: Objection.	14:12	1	MR. GAVENMAN: Okay.	14:14
2	THE WITNESS: I didn't know it.	14:12	2	BY MR. GREIM:	14:14
3	BY MR. GREIM:	14:12	3	Q. All right. So tell me what do you	14:14
4	Q. Do you believe that happened?	14:12	4	recall about this document?	14:14
5	MR. GAVENMAN: Objection.	14:12	5	A. I remember this is -- I don't remember I	14:14
6	MR. GRENDI: Objection.	14:12	6	saw this in my Miles' place. Probably I saw it	14:14
7	THE WITNESS: I didn't remember or recall how	14:12	7	through French, at French's house, but I'm not, you	14:14
8	he walked out. At some point, he asked me, you know,	14:12	8	know, a hundred percent sure.	14:14
9	you need to step in to manage the project.	14:12	9	Q. Do you remember that this is a document	14:14
10	BY MR. GREIM:	14:12	10	that Mr. Guo showed to Mr. Wallop and -- Mr. Waller	14:15
11	Q. So you were gone and then you were back?	14:12	11	and Ms. Wallop?	14:15
12	A. Yes.	14:12	12	A. Most likely.	14:15
13	[Wang Exhibit No. 12 was	14:12	13	MR. GRENDI: Objection.	14:15
14	identified for the record.]	14:12	14	MR. GAVENMAN: Objection.	14:15
15	BY MR. GREIM:	14:12	15	BY MR. GREIM:	14:15
16	Q. Okay. Let's go to the names. I'm going	14:12	16	Q. And did you know that -- well, do you	14:15
17	to show what we've marked in another deposition as	14:12	17	know where these names came from?	14:15
18	Exhibit 12, and you'll see that this is Wang Exhibit	14:12	18	MR. GAVENMAN: Objection.	14:15
19	12. It starts at SVUS000171 and goes to 258, and if	14:13	19	THE WITNESS: I don't know where it comes	14:15
20	you thumb through, you'll see it follows the same	14:13	20	from, but I know this is probably what Miles wanted	14:15
21	format always. There is a number with someone's	14:13	21	them to look into.	14:15
22	name, and then behind it is some information about	14:13	22	BY MR. GREIM:	14:15
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1	that person, and it goes on for several pages, and	14:13	1	Q. Did you discuss with Mr. Guo which names	14:15
2	then there is a second name and so on.	14:13	2	would be good for the project?	14:15
3	Take a second, if you could, just to study	14:13	3	A. No, not at all. This is entirely his.	14:15
4	this and then I'll ask you a few questions about it.	14:13	4	Q. Do you know who did?	14:15
5	A. Yeah. I'm familiar with this.	14:13	5	A. I have no idea.	14:15
6	Q. Okay.	14:13	6	Q. Do you remember a meeting in Guo's	14:15
7	MR. GRENDI: On the record, has Mr. Han	14:13	7	apartment where he had this stack of names and sort	14:15
8	signed the addendum to the protective order?	14:13	8	of tossed it out on the table to Ms. Wallop and Mr.	14:15
9	MR. GREIM: Oh, no. He hasn't. Okay. Let's	14:13	9	Waller and said this cost him \$250 million?	14:15
10	cover this. So we have a protective order in this	14:13	10	MR. GRENDI: Objection.	14:15
11	case, confidential order, and many of the documents	14:13	11	MR. GAVENMAN: Objection.	14:15
12	that we have here today are marked as confidential,	14:14	12	THE WITNESS: I don't remember that. I think	14:15
13	at least as of right now.	14:14	13	the \$2 million, you know, that phrase, that, I	14:15
14	THE WITNESS: Yeah.	14:14	14	remember vaguely, yeah.	14:16
15	MR. GREIM: So we'll ask you, and I'll work	14:14	15	BY MR. GREIM:	14:16
16	with your attorney on this, to sign an order agreeing	14:14	16	Q. Okay. Let me -- that was a compound	14:16
17	to be bound by the protective order in this case,	14:14	17	question too. So let me ask you do you remember Mr.	14:16
18	which means that you can take things here and, you	14:14	18	Guo claiming that this research had cost him, let's	14:16
19	know, show them around, talk them outside. Now, not	14:14	19	say, over \$200 million just to compile this?	14:16
20	all of this is going to end up remaining	14:14	20	A. \$200 million? I don't remember \$200	14:16
21	confidential, but until we've worked it out with the	14:14	21	million. He exaggerates somewhat, like some certain	14:16
22	judge, that's sort of our status quo.	14:14	22	amount for this research.	14:16
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1	Q. Do you remember telling Ms. Wallop and	14:16	1	A. Wang Qishan, W-A-N-G, Q-I-S-H-A-N.	14:18
2	Mr. Waller that the \$200 hundred was probably an	14:16	2	Q. This is the same person that Bannon had	14:18
3	exaggeration?	14:16	3	met with. Right?	14:18
4	A. I probably did.	14:16	4	A. Yes, and Mu Jen Ju is another person	14:18
5	Q. So did there come a time when you did	14:16	5	that is a Chinese security chief. He's also in here.	14:19
6	study the names and information in this packet?	14:16	6	He persecuted Miles' family.	14:19
7	A. Yeah.	14:16	7	Q. Now, do you know whether Mr. Guo ended	14:19
8	Q. When was that?	14:16	8	up getting research on these individuals from some	14:19
9	A. I don't recall the exact date.	14:16	9	other source other than Strategic Vision?	14:19
10	Q. Do you remember why you would have	14:16	10	MR. GRENDI: Objection.	14:19
11	looked through the names?	14:16	11	MR. GAVENMAN: Objection.	14:19
12	A. Why would he look?	14:16	12	THE WITNESS: That, I don't know.	14:19
13	Q. No. Why you would have?	14:17	13	BY MR. GREIM:	14:19
14	MR. GAVENMAN: Objection.	14:17	14	Q. Do you know whether he shared this	14:19
15	THE WITNESS: I think -- I don't remember	14:17	15	information with any of research group after	14:19
16	exactly how when they first come out. The first time	14:17	16	Strategic Vision?	14:19
17	I look at this name, I don't remember exactly, but I	14:17	17	A. I didn't know that either.	14:19
18	did see the list either in New York or in French's	14:17	18	MR. GAVENMAN: Objection.	14:19
19	house, but I just don't remember exactly where.	14:17	19	BY MR. GREIM:	14:19
20	BY MR. GREIM:	14:17	20	Q. Do you know whether he ever hired a	14:19
21	Q. Okay. Do you remember forming any --	14:17	21	group called ASOG out of Texas?	14:19
22	let me just ask you this: Do you remember having any	14:17	22	A. ASOG? No.	14:19
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1	thoughts about whether some of these names would be	14:17	1	Q. Do you know whether he hired an	14:19
2	good subjects for research?	14:17	2	individual named Adam Craft?	14:19
3	A. I think they're all good subjects for	14:17	3	A. No.	14:19
4	research.	14:17	4	Q. Does that name ring a bell to you?	14:19
5	Q. Why is that?	14:17	5	A. Not at all.	14:19
6	A. Because this is the key group in the	14:17	6	Q. Does the name ASOG sound familiar to	14:19
7	control of China's bank system and investment.	14:17	7	you?	14:19
8	Q. So do you know that that's what all	14:17	8	A. Not at all.	14:20
9	these names have in common?	14:18	9	Q. So what did Mr. Guo tell you about this	14:20
10	A. Yes, except --	14:18	10	list, if anything?	14:20
11	MR. GAVENMAN: Objection.	14:18	11	A. He didn't really discuss this list with	14:20
12	THE WITNESS: -- there's -- huh?	14:18	12	me at all, but when I saw it, I know what he's after.	14:20
13	MR. GAVENMAN: Objection to form. You can	14:18	13	Q. Is some of the same information that's	14:20
14	answer.	14:18	14	in this list already on the internet? Have you seen	14:20
15	THE WITNESS: Except there's also like the	14:18	15	it on there?	14:20
16	former party chief's grandson, but for Wang Qishan's	14:18	16	MR. GRENDI: Objection.	14:20
17	group, may of the names here that were in Wang	14:18	17	MR. GAVENMAN: Objection.	14:20
18	Qishan's group, I think they're all involved in	14:18	18	THE WITNESS: There might be some.	14:20
19	Chinese banging corruption.	14:18	19	BY MR. GREIM:	14:20
20	BY MR. GREIM:	14:18	20	Q. Do you have any understanding about who	14:20
21	Q. What's the name? Could you spell out	14:18	21	actually paid Strategic Vision, if anyone, for the	14:20
22	the name that you're telling us? Wang?	14:18	22	work under this agreement?	14:20
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1	MR. GRENDI: Objection.	14:20	1	A. No.	14:22
2	THE WITNESS: I have no idea.	14:20	2	Q. Why not?	14:22
3	BY MR. GREIM:	14:20	3	A. Because I know she is with him for, you	14:22
4	Q. Do you know if it was Guo himself?	14:20	4	know, 16 years at the time. So he trusted her very	14:22
5	MR. GAVENMAN: Objection.	14:21	5	much.	14:23
6	THE WITNESS: I have no idea.	14:21	6	Q. But why would Mr. Guo tell other people	14:23
7	BY MR. GREIM:	14:21	7	that he did not trust her?	14:23
8	Q. Do you know whether Guo consulted with	14:21	8	MR. GRENDI: Objection.	14:23
9	anyone else in coming up with the names?	14:21	9	MR. GAVENMAN: Objection.	14:23
10	MR. GAVENMAN: Objection.	14:21	10	THE WITNESS: I have no idea.	14:23
11	MR. GRENDI: Objection.	14:21	11	BY MR. GREIM:	14:23
12	THE WITNESS: He might have, but he didn't	14:21	12	Q. Well, do you know why you, once again,	14:23
13	mention that to me.	14:21	13	replaced Yvette Wang later on in the parties'	14:23
14	BY MR. GREIM:	14:21	14	dealings?	14:23
15	Q. Do you know whether Guo planned to share	14:21	15	MR. GRENDI: Objection.	14:23
16	the research results from this agreement with any	14:21	16	MR. GAVENMAN: Objection.	14:23
17	other person?	14:21	17	THE WITNESS: I think he tried to salvage the	14:23
18	MR. GRENDI: Objection.	14:21	18	project. He saw the project falling apart because he	14:23
19	MR. GAVENMAN: Objection, form	14:21	19	didn't get what he is paying for and he thought maybe	14:23
20	THE WITNESS: I didn't know that.	14:21	20	I can better communicate with French and Mike's team	14:23
21	BY MR. GREIM:	14:21	21	and get what he's looking for.	14:23
22	Q. So do you recall, roughly, the date when	14:21	22	BY MR. GREIM:	14:24
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1	-- well, let me back up for a second.	14:22	1	Q. Okay. Do you know whether Strategic	14:24
2	I understand your testimony to be that while	14:22	2	Vision wanted to have you as their point, their main	14:24
3	you were involved with Mr. Guo and Strategic Vision,	14:22	3	point of contact?	14:24
4	some deal was agreed to in principle. Correct?	14:22	4	MR. GAVENMAN: Objection.	14:24
5	A. Yes.	14:22	5	THE WITNESS: Yes.	14:24
6	MR. GRENDI: Objection.	14:22	6	BY MR. GREIM:	14:24
7	BY MR. GREIM:	14:22	7	Q. And did they say why that was?	14:24
8	Q. Then at that point, Yvette Wang came in	14:22	8	MR. GAVENMAN: Objection.	14:24
9	to take over negotiating the details of the contract	14:22	9	THE WITNESS: I think they feel they can	14:24
10	itself?	14:22	10	better communicate with me and also they trust me, I	14:24
11	MR. GAVENMAN: Objection.	14:22	11	think.	14:24
12	MR. GRENDI: Objection.	14:22	12	BY MR. GREIM:	14:24
13	THE WITNESS: Yes.	14:22	13	Q. By the way, did you discuss with	14:24
14	BY MR. GREIM:	14:22	14	Strategic Vision the importance of not using Chinese	14:24
15	Q. Did it -- knowing that Mr. Guo had been	14:22	15	entities as either the contracting parties or the	14:24
16	concerned about Ms. Wang earlier, did it surprise you	14:22	16	funding parties for the contract?	14:24
17	that she was brought in to negotiate the contract?	14:22	17	MR. GAVENMAN: Objection.	14:24
18	MR. GRENDI: Objection.	14:22	18	MR. GRENDI: Objection.	14:24
19	MR. GAVENMAN: Objection.	14:22	19	THE WITNESS: I didn't remember specifically	14:25
20	THE WITNESS: No.	14:22	20	that suggestion.	14:25
21	BY MR. GREIM:	14:22	21	BY MR. GREIM:	14:25
22	Q. Did it concern you?	14:22	22	Q. Knowing what you know about the mainland	14:25
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1	and about the Chinese Government --	14:25	1	MR. GAVENMAN: Objection.	14:27
2	A. Right.	14:25	2	THE WITNESS: It's possible, yes. Hong Kong	14:27
3	Q. -- do you agree that it would be prudent	14:25	3	has a different system, but China has a lot of	14:27
4	not to use a Chinese entity or a Chinese bank to pay	14:25	4	difference there.	14:27
5	Strategic Vision under the contract?	14:25	5	BY MR. GREIM:	14:27
6	MR. GRENDI: Objection.	14:25	6	Q. When did you first hear of the entity	14:27
7	MR. GAVENMAN: Objection.	14:25	7	called Eastern Profit?	14:27
8	THE WITNESS: I didn't -- I -- from the very	14:25	8	A. I don't think I ever heard that term	14:27
9	beginning, we want to keep this highly confidential.	14:25	9	until this case, you know, showed up.	14:27
10	Everything we do has to be, you know, like very	14:25	10	Q. Did you know that Mr. Guo's daughter is	14:27
11	cautious, and whether I made that specific	14:25	11	the sole shareholder and director of Eastern Profit?	14:27
12	suggestion, I don't remember, but if I did, it must	14:25	12	MR. GRENDI: Objection.	14:27
13	be based on that principle.	14:25	13	MR. GAVENMAN: Objection.	14:27
14	BY MR. GREIM:	14:25	14	THE WITNESS: No.	14:27
15	Q. And that would be common sense, wouldn't	14:25	15	BY MR. GREIM:	14:27
16	it?	14:25	16	Q. Do you know whether Mr. Guo typically	14:27
17	MR. GRENDI: Objection.	14:25	17	has his children hold companies that he uses for his	14:27
18	MR. GAVENMAN: Objection.	14:25	18	projects?	14:27
19	THE WITNESS: It is not necessarily Chinese	14:25	19	A. I didn't.	14:28
20	company. I think it's how confidential, how	14:25	20	MR. GRENDI: Objection.	14:28
21	trustworthy they are, not the entities, from where.	14:26	21	MR. GAVENMAN: Objection.	14:28
22	It's the discrete nature of the entity that matters.	14:26	22	THE WITNESS: I didn't know.	14:28
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1	BY MR. GREIM:	14:26	1	BY MR. GREIM:	14:28
2	Q. Well, what about the ability of Chinese	14:26	2	Q. Did you always understand that	14:28
3	officials to follow the wire from, you know, a	14:26	3	regardless of who signed the contract that that	14:28
4	Chinese account directly to Strategic Vision?	14:26	4	person or entity would be reporting to Mr. Guo?	14:28
5	MR. GRENDI: Objection.	14:26	5	MR. GRENDI: Objection.	14:28
6	MR. GAVENMAN: Objection.	14:26	6	MR. GAVENMAN: Objection to form.	14:28
7	THE WITNESS: Well, yeah. It's definitely	14:26	7	THE WITNESS: Yes.	14:28
8	easier to track if it's a Chinese company based in	14:26	8	BY MR. GREIM:	14:28
9	China.	14:26	9	Q. Have you ever heard that Hansheng Wang	14:28
10	BY MR. GREIM:	14:26	10	was actually in charge of Eastern Profit?	14:28
11	Q. What about an entity based in Hong Kong?	14:26	11	A. I didn't know that. I thought you said	14:28
12	MR. GAVENMAN: Objection to form.	14:26	12	his daughter.	14:28
13	MR. GRENDI: Objection.	14:26	13	Q. Would it surprise to hear that in this	14:28
14	MR. GAVENMAN: I'm not sure what that	14:26	14	case, Eastern Profit claims that its principal is	14:28
15	question even is. Can you rephrase that question?	14:26	15	Hansheng Wang?	14:28
16	THE WITNESS: Yes.	14:27	16	MR. GAVENMAN: Objection, form.	14:28
17	BY MR. GREIM:	14:27	17	THE WITNESS: I have no idea.	14:28
18	Q. Did you understand it?	14:27	18	BY MR. GREIM:	14:28
19	A. Maybe you can rephrase.	14:27	19	Q. Did you ever talk to Hansheng Wang about	14:28
20	Q. Is it also easier to track if the money	14:27	20	this project at all?	14:29
21	comes from an entity based in Hong Kong?	14:27	21	A. No.	14:29
22	MR. GRENDI: Objection.	14:27	22	Q. Would it surprise if Hansheng Wang was	14:29
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1	in charge of a research project like for this for Mr. Guo?	14:29	1	Q. And then if you keep going -- I think it's still the same thread -- you'll go to page 1869. You'll see that toward the top, she says: "Also on other fav subject, Y mentioned on Wed she needs to get back to NY to collect her bonus for the year. So she would be excited that NY would be glad that we had an agreement finally."	14:31
2		14:29	2	Does that appear to be a reference to Yvette Wang?	14:32
3	MR. GRENDI: Objection.	14:29	3	A. Correct.	14:32
4	MR. GAVENMAN: Objection, form.	14:29	4	MR. GAVENMAN: Objection.	14:32
5	THE WITNESS: As I said, nothing surprises me.	14:29	5	MR. GRENDI: Objection.	14:32
6		14:29	6	BY MR. GREIM:	14:32
7	BY MR. GREIM:	14:29	7	Q. Does it appear to you that by December 30th, Yvette Wang was now negotiating directly with French Wallop?	14:32
8	Q. Have you ever heard of an entity called Celestial Tide Holdings?	14:29	8	A. Yes.	14:32
9		14:29	9	MR. GAVENMAN: Objection.	14:32
10	A. Never.	14:29	10	MR. GREIM: All right. Let's go ahead and take a break at that point, because we're about done with the video.	14:32
11	Q. Do you recall that after Yvette Wang came in to finalize the contract with Strategic Vision that new disputes erupted?	14:30	11	VIDEOGRAPHER: This ends Disk No. 2, going	14:32
12		14:30	12		
13	MR. GRENDI: Objection.	14:30	13		
14	MR. GAVENMAN: Objection.	14:30	14		
15	THE WITNESS: I didn't. If I did, maybe from French, not from Miles or Yvette.	14:30	15		
16		14:30	16		
17	BY MR. GREIM:	14:30	17		
18	Q. Okay. If you look on December 30th, this is on page 1867 of Han Exhibit 10.	14:30	18		
19		14:30	19		
20	A. 67?	14:30	20		
21		14:30	21		
22	Q. Um-hum.	14:30	22		
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1	A. There it is. Yeah.	14:30	1	off the record. The time is now 2:34 p.m.	14:32
2	Q. You'll see that Ms. Wallop begins that day responding to a question from you about the other matter that you were working on.	14:30	2	[Recess.]	14:52
3		14:30	3	VIDEOGRAPHER: This begins Disk No. 3 in the video deposition of Lianchao Han. We are back on the record. The time is 2:54 p.m.	14:52
4	A. Yes.	14:31	4		14:52
5	Q. It looks like you were taking some CLE.	14:31	5	BY MR. GREIM:	14:52
6	A. Yes.	14:31	6	Q. Mr. Han, welcome back.	14:52
7		14:31	7	A. Thank you.	14:52
8	Q. And you see at the bottom of that, the first thing she says: "What time on Tuesday? Did you speak with NY?"	14:31	8	Q. If you could, we left on page 1869, but I've got a question for you -- this is still in Exhibit 10 -- about the pages 1884 through 1903, which is the last page.	14:53
9		14:31	9		14:53
10	A. Let me see.	14:31	10	A. Right.	14:53
11	Q. It's right before the three emojis.	14:31	11	Q. And my question for you is would you agree with me that everything from 1884 to 1903 refers to matters other than the Strategic Vision Eastern Profit contract?	14:53
12		14:31	12		14:53
13	A. Okay. "What time on Tuesday? Did you speak with NY?"	14:31	13	A. I think most the time, most of it, yes.	14:53
14		14:31	14	That's correct, except maybe 86.	14:53
15	Yeah. Yeah. That's New York. It refers to Miles Kwok.	14:31	15	Q. Oh.	14:53
16		14:31	16	A. I think that looks like --	14:53
17	Q. Okay. And you'll see that she goes on that morning and sends you some hotel recommendations?	14:31	17	Q. Yeah.	14:53
18		14:31	18		
19	A. Yes.	14:31	19		
20	Q. And many other things?	14:31	20		
21		14:31	21		
22	A. Yes.	14:31	22		
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1	A. -- about their disputes.	14:53	1	A. Um-hum.	14:56
2	Q. Okay. And that's a text exchange on	14:53	2	Q. Did you have any understanding that	14:56
3	February 26th, it looks like. Right?	14:53	3	Yvette Wang was a project manager on this?	14:56
4	A. Yes.	14:54	4	MR. GAVENMAN: Object to the form.	14:56
5	Q. Okay. All right. Then I guess -- all	14:54	5	MR. GRENDI: Objection.	14:56
6	right. I follow you. I guess on February 28th, on	14:54	6	THE WITNESS: I didn't know until maybe	14:56
7	1887, that is about the lawsuit as well.	14:54	7	later.	14:56
8	A. Correct. I mean the dispute of some	14:54	8	BY MR. GREIM:	14:56
9	sort.	14:54	9	Q. Okay.	14:56
10	Q. Okay. So would you agree with me,	14:54	10	A. Not at that point.	14:56
11	though, that everything else in here is about other	14:54	11	Q. Had you ever heard that title used with	14:56
12	work that you were discussing with Ms. Wallop?	14:54	12	respect to Yvette Wang, that she was a project	14:56
13	A. Correct.	14:54	13	manager?	14:56
14	Q. Did any of those dealings come to	14:54	14	A. I didn't know. I didn't, no.	14:56
15	fruition?	14:54	15	Q. Now you said until maybe later. Was	14:56
16	A. No.	14:54	16	there some point where you did learn that she was	14:56
17	Q. Let me ask you -- let's go back to 1869.	14:54	17	project manager?	14:57
18	A. Yeah.	14:54	18	MR. GAVENMAN: Objection to form.	14:57
19	Q. And I want you to focus on after the	14:54	19	MR. GRENDI: Objection.	14:57
20	three question marks that end a sentence somewhere	14:54	20	THE WITNESS: I don't think they ever used	14:57
21	about in the middle or so.	14:55	21	the project manager, but she is in charge of the	14:57
22	A. 89?	14:55	22	project.	14:57
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1	Q. On 1869.	14:55	1	BY MR. GREIM:	14:57
2	A. 69?	14:55	2	Q. If you look at page 1879 and go to the	14:57
3	Q. Yeah.	14:55	3	top --	14:57
4	A. Sorry. Okay.	14:55	4	A. Yeah.	14:57
5	Q. Three question marks, and then Ms.	14:55	5	Q. -- you see this is a carryover from the	14:57
6	Wallop says: "I naturally asked tea or water ginger	14:55	6	previous page.	14:57
7	ale, and her comment, quote, no, we need to talk	14:55	7	A. Right.	14:57
8	about agreement. I spoke for two hours with HK and	14:55	8	Q. But Ms. Wallop is sending you a piece	14:57
9	they told me I cannot sign for monthly amount,	14:55	9	about HNA that was in "The Financial Times". Do you	14:57
10	exclamation point, but her boss told her to do it and	14:55	10	see that?	14:58
11	come back with signed doc."	14:55	11	A. Okay.	14:58
12	Did I read that right?	14:55	12	[Witness peruses exhibit.]	14:58
13	A. Um-hum.	14:55	13	THE WITNESS: Okay.	14:58
14	Q. Now, did you ever hear Yvette Wang or	14:55	14	BY MR. GREIM:	14:58
15	Mr. Guo talk about having to check with individuals	14:55	15	Q. And then your response to her is: "I	14:58
16	in Hong Kong?	14:56	16	gave the story to WSJ a week ago. They're too slow,	14:58
17	A. No.	14:56	17	but we have more details."	14:58
18	Q. If you go to page 1871, after the emojis	14:56	18	And then continuing to the next page: "My	14:58
19	toward the top, you'll see: "She said and as she	14:56	19	advice is to focus on what already in place to	14:58
20	kept saying with abundant authority, I am project	14:56	20	harvest and what will be harvested would be harvested	14:58
21	manager. I decide."	14:56	21	in the next batch. Good luck."	14:58
22	Do you see that?	14:56	22	Did I read the right?	14:58
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1	A. Yes.	14:58	1	supposed to touch them, even look into them. I don't	15:01
2	Q. What was your intent -- first of all,	14:58	2	know if that's true or not, but I said my point is	15:01
3	were you talking to her about the Strategic Vision	14:58	3	even if you have five people you can't touch, but	15:01
4	work?	14:58	4	there's so many on the list. At least you need to	15:01
5	MR. GAVENMAN: Objection to form.	14:58	5	produce something substantial that will satisfy Miles	15:01
6	MR. GRENDI: Objection.	14:58	6	and the contractual, you know, obligations and	15:01
7	THE WITNESS: When was this?	14:58	7	satisfy Miles; otherwise, I said we're going to be	15:01
8	Okay. But we have more detail. Okay. Yeah.	14:58	8	trouble. I think that's what I see coming. Miles	15:02
9	I know what -- can you reframe your question, please?	14:59	9	will terminate the contract. There will be lawsuits	15:02
10	BY MR. GREIM:	14:59	10	going on between the two sides, exactly what I said	15:02
11	Q. Sure. Were you speaking with her about	14:59	11	at the time.	15:02
12	the Strategic Vision work on the research?	14:59	12	Q. And that what you were trying to avoid	15:02
13	MR. GRENDI: Objection.	14:59	13	here?	15:02
14	MR. GAVENMAN: Objection, form.	14:59	14	A. Correct.	15:02
15	THE WITNESS: Yeah. It looks like it.	14:59	15	MR. GRENDI: Objection.	15:02
16	BY MR. GREIM:	14:59	16	MR. GREIM: Okay. I'm now going to show you	15:02
17	Q. And what was your advice to her?	14:59	17	what we marked in another deposition as Exhibit 5.	15:02
18	A. I don't remember specifically. It looks	14:59	18	[Wang Exhibit No. 5 was	15:02
19	like my advice is to focus on what's already in place	14:59	19	identified for the record.]	15:02
20	to harvest and what will be harvested in the next	14:59	20	BY MR. GREIM:	15:02
21	batch. Yeah. I think that I advised them to follow	14:59	21	Q. And these are -- this is Wang Exhibit 5,	15:02
22	the schedule of the deliverables, don't deviate from	14:59	22	Bates labeled SVUS000061 to 76. These are a series	15:02
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1	that.	14:59	1	of texts between you and not Ms. Wallop, but,	15:02
2	Q. So let me move on now to 1882 and you'll	14:59	2	instead, with Mr. Waller.	15:02
3	see -- this is probably the last thing we'll get to	15:00	3	A. Um-hum.	15:03
4	in this packet here. You'll see on February 17,	15:00	4	Q. And so the very first thing we see here	15:03
5	2018, you say: "F, I am disappointed with the	15:00	5	is from December 11, 2017, and I think the first	15:03
6	result. Even there are five RP people, but we still	15:00	6	order of business is let's figure out who's dark gray	15:03
7	many left. We didn't get anything. It put me in a	15:00	7	and who's light gray.	15:03
8	very difficult spot. More importantly, it failed to	15:00	8	A. Okay.	15:03
9	advance our agenda. We have to push the teams to	15:00	9	Q. So can you tell so far which one of	15:03
10	produce and we will in trouble."	15:00	10	these two speakers is you?	15:03
11	Then you go and it looks like you discuss	15:00	11	A. I think the light gray, that must be me.	15:03
12	another topic for the end of that.	15:00	12	Q. Okay.	15:03
13	What were you referring to in that first	15:00	13	A. Because mine is short. I type really	15:03
14	paragraph with five RP people?	15:00	14	slow.	15:03
15	A. Yeah. This, if I recall correctly, this	15:00	15	Q. Well, you are definitely a shorter	15:03
16	was Miles put me back in charge, in charge of	15:00	16	texter than most people. You don't use emojis.	15:03
17	managing the project, and I think Mike French and the	15:01	17	A. I don't.	15:03
18	team didn't produce anything of substance. So I said	15:01	18	Q. So is it -- does it appear to you that	15:03
19	I'm really disappointed with the result.	15:01	19	you met with at least Mr. Waller around December 11,	15:03
20	They claimed the difficulty of extracting	15:01	20	2017.	15:04
21	information, because there are five people that is on	15:01	21	A. Yeah. I don't recall the specific date.	15:04
22	the restriction of American Government. You're not	15:01	22	Q. Right.	15:04
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1	A. And I don't know where we met, because	15:04	1	could not provide. I hope your trip is fruitful."	15:06
2	he was -- he didn't show up -- no. I don't remember	15:04	2	Do you see that?	15:06
3	was he in the first meeting with Miles. Probably	15:04	3	A. Um-hum.	15:06
4	not. He was behind. Yeah. I don't recall	15:04	4	Q. And then you say: Great meeting with	15:06
5	specifically the date.	15:04	5	our friend. He is coming in two weeks in	15:06
6	Q. Did you feel that you had a good rapport	15:04	6	Washington."	15:06
7	with Mr. Waller?	15:04	7	Who are you speaking of there?	15:06
8	A. What?	15:04	8	A. I think this is a friend from Tokyo.	15:06
9	Q. Did you feel that you a good rapport	15:04	9	Q. This is Tokyo?	15:06
10	with Mr. Waller?	15:04	10	A. Yeah.	15:06
11	A. Yes.	15:04	11	Q. Is Mr. Waller talking about this	15:06
12	Q. In fact, did you share the same mentor,	15:04	12	particular project or another one? Can you tell?	15:06
13	someone named Bernie?	15:04	13	MR. GAVENMAN: Objection, form.	15:06
14	A. Correct. Yes.	15:04	14	MR. GRENDI: Objection.	15:06
15	Q. And so Bernie had been -- had served	15:04	15	THE WITNESS: 62?	15:06
16	with Chaing Kai-shek or something like that?	15:04	16	BY MR. GREIM:	15:06
17	A. He was hero in anti-Japanese war. He	15:04	17	Q. Um-hum.	15:06
18	was involved in the KMT, the Taiwan Government	15:04	18	A. Another week's time -- I think this is	15:06
19	intelligence.	15:05	19	talking about -- he's talking about Miles' research	15:07
20	Q. I see. So he was a mentor to you, but	15:05	20	project.	15:07
21	also a mentor to Mr. Waller?	15:05	21	Q. Well, were there some things that	15:07
22	A. Correct.	15:05	22	Strategic Vision said that they could not provide and	15:07
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1	Q. But probably not at the same time?	15:05	1	then they say, no, they could?	15:07
2	A. Roughly around the time.	15:05	2	MR. GRENDI: Objection, form.	15:07
3	Q. Oh, around the same time. Okay.	15:05	3	MR. GAVENMAN: Objection.	15:07
4	A. Yes.	15:05	4	THE WITNESS: I don't specifically recall	15:07
5	Q. Sorry.	15:05	5	what they say they cannot provide. I think	15:07
6	Okay. So let's go to the next page. You'll	15:05	6	everything is based on what's in the contract.	15:07
7	see that on December the 14th now, the dark gray is	15:05	7	BY MR. GREIM:	15:07
8	saying: "I had a very productive meeting with a key	15:05	8	Q. Okay.	15:07
9	capabilities person who is ready. I asked him for	15:05	9	A. If they said they can't provide, that's	15:07
10	another week's time to we don't lose his team. He	15:05	10	supposed to be specified in the contract.	15:07
11	agreed."	15:05	11	Q. Let me direct you now to the December	15:07
12	Do you see that?	15:05	12	23rd texts. They go from 64 to 65.	15:07
13	A. Yes.	15:05	13	A. 65.	15:07
14	Q. Do you recall what Mr. Waller is telling	15:05	14	Q. It starts off with Mr. Waller asking	15:07
15	you there, what he's talk about?	15:05	15	you: "Any news?"	15:07
16	A. I don't. No. I don't remember	15:05	16	A. Any news? Yeah. This is, again, I	15:07
17	specifically --	15:06	17	think this is the Tokyo guy.	15:08
18	Q. Okay.	15:06	18	Q. Okay. And then what about your text at	15:08
19	A. -- the content.	15:06	19	6:19 a.m.?	15:08
20	Q. Let's go down a few days later. Mr.	15:06	20	You say -- it looks like Mr. Waller says:	15:08
21	Waller says: "We can now provide the entire menu	15:06	21	"What about the guy we saw last week?"	15:08
22	that the friend requested, including items we said we	15:06	22	And then you respond: "I will ask."	15:08
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1	A. I always correct him and maybe I didn't	15:16	1	want to reveal our work to anybody else."	15:18
2	see, you know, I would accept his offer to work for	15:16	2	Do you see that?	15:18
3	him.	15:16	3	A. Yes.	15:18
4	Q. Well, you say you'd always correct him,	15:16	4	Q. Do you remember Strategic Vision	15:18
5	but in what sense were you disappointed with him?	15:16	5	generally being concerned about others learning about	15:18
6	A. I -- let's see. In one sense, he won't	15:16	6	this project?	15:18
7	listen to me, to my advice. That's the main reason.	15:16	7	A. Right.	15:18
8	We have a political agenda, you know, we both agree	15:16	8	MR. GAVENMAN: Objection.	15:18
9	to push, and I always gave advice, I think sound	15:16	9	BY MR. GREIM:	15:18
10	advice. He just wouldn't listen to me.	15:17	10	Q. Do you recall them being concerned that	15:18
11	Q. Is there anyone he does listen to?	15:17	11	their research teams or research methods might be	15:18
12	A. No.	15:17	12	exposed to others?	15:18
13	MR. GAVENMAN: Objection, form.	15:17	13	MR. GAVENMAN: Objection.	15:18
14	MR. GRENDI: Objection.	15:17	14	MR. GRENDI: Objection.	15:18
15	BY MR. GREIM:	15:17	15	THE WITNESS: Yes.	15:18
16	Q. Then you see Mr. Waller responds: "If	15:17	16	BY MR. GREIM:	15:18
17	you aren't part of the deal, I don't want to be	15:17	17	Q. And did you understand that they felt	15:18
18	either."	15:17	18	that you were the most trustworthy person on the	15:18
19	A. Yes.	15:17	19	other side of the contract?	15:18
20	Q. "Anybody who is friends with Bernie and	15:17	20	MR. GAVENMAN: Objection.	15:18
21	Judd is my kind of person."	15:17	21	MR. GRENDI: Objection.	15:18
22	Who is Judd?	15:17	22	THE WITNESS: Yes.	15:18
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1	A. Judd is my boss, a senator from New	15:17	1	BY MR. GREIM:	15:18
2	Hampshire.	15:17	2	Q. You see, next, Mr. Waller maybe senses	15:18
3	Q. Oh, okay. Well, then you respond: "He	15:17	3	something. So he says: "What is your preference?"	15:19
4	thinks this will protect me."	15:17	4	And your response is that you don't really	15:19
5	Right?	15:17	5	care; is that right?	15:19
6	A. Yes.	15:17	6	A. Right.	15:19
7	Q. And do you remember Mr. Guo saying that?	15:17	7	Q. Were you actually willing to sign the	15:19
8	A. Because --	15:17	8	contract if you had to?	15:19
9	MR. GAVENMAN: Objection to form.	15:17	9	A. Yes.	15:19
10	MR. GRENDI: Objection.	15:17	10	Q. If you had, do you know who would have	15:19
11	THE WITNESS: I think this is, you know, like	15:17	11	paid for it?	15:19
12	several days, kind of different days, and then he	15:17	12	A. I don't.	15:19
13	didn't want me to sign. He said, you know, the	15:17	13	Q. Do you see Mr. Waller say in response:	15:19
14	reason I didn't want you to get involved because I	15:17	14	"I don't want some stranger signing it who doesn't	15:19
15	want to protect you.	15:17	15	know what he's talking about and will jerk us around.	15:19
16	BY MR. GREIM:	15:17	16	We must report to you and only you for quality	15:19
17	Q. Then you see -- go to the next page, 70.	15:17	17	control."	15:19
18	Mr. Waller says: "Protect you from what? Any	15:18	18	A. Um-hum.	15:19
19	attempt to do anything in court will expose	15:18	19	Q. Then you thank Mr. Waller for his trust.	15:19
20	everything and that isn't worth a lousy million	15:18	20	A. Um-hum.	15:19
21	dollars for either party. Do you see a necessity on	15:18	21	Q. Mr. Han, do you think that there was a	15:19
22	your part to have some else as a signer? I don't	15:18	22	misunderstanding between Mr. Guo and Strategic Vision	15:19
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<p>1 Waller's E-mail of concern -- or I'm sorry -- text of 15:24</p> <p>2 concern, which is at SVUS000072, you see he discusses 15:24</p> <p>3 the concerns that we just talk about. 15:24</p> <p>4 A. Yeah. 15:24</p> <p>5 Q. Then you can see your response at 10:20 15:24</p> <p>6 on December 28t: "I appreciate your trust. I think 15:24</p> <p>7 it is important to get him to sign the contract." 15:24</p> <p>8 Are you talking about Mr. Guo? 15:24</p> <p>9 A. Yes. 15:24</p> <p>10 Q. You see we can work on security later. 15:24</p> <p>11 He wants me to work for him exclusively, which I have 15:24</p> <p>12 to think about. 15:24</p> <p>13 A. Correct. 15:24</p> <p>14 Q. So is it something you were still 15:24</p> <p>15 considering on December 28th? 15:24</p> <p>16 MR. GRENDI: Objection. 15:24</p> <p>17 MR. GAVENMAN: Objection. 15:24</p> <p>18 THE WITNESS: Yes. 15:24</p> <p>19 BY MR. GREIM: 15:24</p> <p>20 Q. When did you decide that it was 15:24</p> <p>21 something you really did not want to do? 15:24</p> <p>22 MR. GRENDI: Objection. 15:24</p> <p style="text-align: right;">Page 218</p>	<p>1 A. Yes. 15:26</p> <p>2 Q. Now let me stop you there for a second. 15:26</p> <p>3 Do you see that above that, back on December 28th, 15:26</p> <p>4 you had forecast that Yvette wanted to talk about the 15:26</p> <p>5 deposit? 15:26</p> <p>6 MR. GAVENMAN: Objection. 15:26</p> <p>7 MR. GRENDI: Objection. 15:26</p> <p>8 MR. GAVENMAN: Form. 15:26</p> <p>9 THE WITNESS: Which? 15:26</p> <p>10 BY MR. GREIM: 15:26</p> <p>11 Q. If you look, we're on 73. 15:26</p> <p>12 A. Yeah. 15:26</p> <p>13 Q. If you go right above there, that's on 15:26</p> <p>14 December 30th. Go back to the 28th. 15:26</p> <p>15 You see he asks you, he says: "Okay. Do you 15:26</p> <p>16 think the contract will be signed today?" 15:26</p> <p>17 And then you say: "Don't know. I think he 15:26</p> <p>18 wants to talk about the deposit." 15:26</p> <p>19 A. Right. 15:26</p> <p>20 Q. So does that make you think maybe you 15:26</p> <p>21 were privy to discussions between Yvette and Mr. Guo 15:26</p> <p>22 before she was sent down to sign the contract? 15:26</p> <p style="text-align: right;">Page 220</p>
<p>1 MR. GAVENMAN: Objection. 15:24</p> <p>2 THE WITNESS: I have no idea when. 15:24</p> <p>3 BY MR. GREIM: 15:24</p> <p>4 Q. Even while Yvette Wang was negotiating 15:24</p> <p>5 with Strategic Vision, were you still getting some 15:25</p> <p>6 information about the negotiations? 15:25</p> <p>7 MR. GRENDI: Objection. 15:25</p> <p>8 MR. GAVENMAN: Objection. 15:25</p> <p>9 THE WITNESS: Not from Miles, but from French 15:25</p> <p>10 and Mike a little bit. 15:25</p> <p>11 BY MR. GREIM: 15:25</p> <p>12 Q. Right. 15:25</p> <p>13 A. Whatever they could share. 15:25</p> <p>14 Q. So if you look, for example, at the 15:25</p> <p>15 bottom of SVUS000073, you see Mike reaches out and 15:25</p> <p>16 says "Please call F". Is that French? 15:25</p> <p>17 A. Yes. 15:26</p> <p>18 Q. "We agreed on the deposit. That wasn't 15:26</p> <p>19 a problem. However, today, Y came back with major, 15:26</p> <p>20 reasonable changes to thing that we had agreed in 15:26</p> <p>21 writing on December 12th." 15:26</p> <p>22 Do you see that? 15:26</p> <p style="text-align: right;">Page 219</p>	<p>1 A. Absolutely no. 15:27</p> <p>2 MR. GRENDI: Objection. 15:27</p> <p>3 MR. GAVENMAN: Objection. 15:27</p> <p>4 THE WITNESS: No. 15:27</p> <p>5 BY MR. GREIM: 15:27</p> <p>6 Q. No? 15:27</p> <p>7 A. No. I'm pretty sure about that. 15:27</p> <p>8 Q. Okay. And let's now move to 74. After 15:27</p> <p>9 Mr. Waller raises his concern about changes being 15:27</p> <p>10 proposed by Yvette, you see you respond later that 15:27</p> <p>11 day on the 30th and you say: "I talked with F." 15:27</p> <p>12 That's French. Right? 15:27</p> <p>13 A. Yes. 15:27</p> <p>14 Q. "It's better to wait a couple of days. 15:27</p> <p>15 Miles -- that's Mr. Guo? 15:27</p> <p>16 A. Yes. 15:27</p> <p>17 Q. "Communicated with me a few times today, 15:27</p> <p>18 but did not mention the failure." 15:27</p> <p>19 A. Right. 15:27</p> <p>20 Q. Did you see that? 15:27</p> <p>21 A. Yes. 15:27</p> <p>22 Q. Now, do you think it's possible that Mr. 15:27</p> <p style="text-align: right;">Page 221</p>

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1	Guo didn't know about the interaction between	15:27	1	Q. I guess I'll tell you this. Feel free	15:31
2	Ms. Wang and French?	15:27	2	to look at the agreement if you want to. What I	15:31
3	MR. GAVENMAN: Objection to form.	15:27	3	really wanted to ask is if you could remember having	15:31
4	MR. GRENDI: Objection.	15:27	4	an understanding about it.	15:31
5	THE WITNESS: I have no idea. I don't think	15:27	5	A. About the deposit?	15:31
6	it's possible.	15:27	6	Q. About the deposit.	15:31
7	MR. GREIM: Okay. Now, earlier, I	15:27	7	A. I didn't know the end result of what	15:31
8	represented to you that the agreement was signed on	15:28	8	they put in the signed form.	15:31
9	January 6th. I'm going to show -- we're going to go	15:28	9	Q. Okay. Then what about the contents of	15:31
10	ahead and mark this even though it's been used	15:28	10	the weekly reports; did you have an understanding	15:31
11	before. I'll just mark it again. I'm going to show	15:28	11	about -- if you want to look at the agreement because	15:32
12	you what we're marking as Han Exhibit 11.	15:29	12	you think it will refresh your memory, do it. That's	15:32
13	[Han Exhibit No. 11 was	15:29	13	fine, but I first want to ask you did you have an	15:32
14	marked for identification.]	15:29	14	understanding about what was going to be in those	15:32
15	BY MR. GREIM:	15:29	15	weekly reports?	15:32
16	Q. I'll represent to you that this is the	15:29	16	MR. GRENDI: Objection to the form.	15:32
17	final signed agreement. Could you turn to page 5.	15:29	17	MR. GAVENMAN: Objection.	15:32
18	It's labeled Eastern-000009.	15:29	18	THE WITNESS: I have a rough idea, because I	15:32
19	Can you tell us the name that is signed there	15:29	19	think we discussed during the meeting he wants	15:32
20	for Eastern Profit?	15:29	20	something of substance, not, you know, junk	15:32
21	MR. GRENDI: Objection.	15:29	21	information, and that, I'm pretty sure.	15:32
22	THE WITNESS: It looks like Han G. Wang, but	15:29	22	BY MR. GREIM:	15:32
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1	it's script. It's hard to tell, but it looks like --	15:29	1	Q. Do you recall, though, the idea that	15:32
2	it's hard to tell, but maybe it's Han.	15:29	2	there would be a ramp-up period, as Mr. Waller texted	15:32
3	BY MR. GREIM:	15:30	3	to you --	15:32
4	Q. Does it look like Yanping Wang?	15:30	4	A. Yes.	15:32
5	A. No.	15:30	5	Q. -- in which the reports would not be the	15:32
6	Q. What's the date that you seen underneath	15:30	6	same as the reports that would come later?	15:32
7	it?	15:30	7	MR. GRENDI: Objection to form.	15:32
8	A. January 6th.	15:30	8	MR. GAVENMAN: Objection.	15:32
9	Q. Did you understand whether the deposit	15:30	9	THE WITNESS: He mentioned that to me. I	15:32
10	would be refundable?	15:30	10	also expressed my concern, those types, because the	15:33
11	MR. GAVENMAN: Objection, form.	15:31	11	assignments, the target is very clear. So there's no	15:33
12	MR. GRENDI: Objection.	15:31	12	point going around and around for those information	15:33
13	THE WITNESS: I don't know. Where is it in	15:31	13	that the client already has. I made that point so	15:33
14	the paper, in the document?	15:31	14	many times in the past.	15:33
15	BY MR. GREIM:	15:31	15	BY MR. GREIM:	15:33
16	Q. If you see on page 5, under Payment	15:31	16	Q. Do you recall after an initial meeting	15:33
17	Terms --	15:31	17	that the start date of the contract was postponed?	15:33
18	A. Yeah.	15:31	18	A. Say that again.	15:33
19	Q. -- that's the reference that I see, but	15:31	19	Q. Do you recall that after an initial	15:33
20	I don't want to suggest to you an answer.	15:31	20	meeting that the start date of the contract was	15:33
21	[Witness peruses exhibit.]	15:31	21	postponed?	15:33
22	BY MR. GREIM:	15:31	22	A. I was not involved in that. So I don't	15:33
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1	recall specifically. There are some glitches, you	15:34	1	and Rule of Law and perfectly, he mentioned many	15:37
2	know, like something going. I also remember French	15:34	2	times to me that he strongly opposed to CGP's	15:37
3	told me in the middle, you know, the wire transfer	15:34	3	dictatorship.	15:37
4	and Miles tried to stop the second payment.	15:34	4	Q. When did he move from second to the	15:37
5	Q. I'm going to be -- make sure I'm a clear	15:34	5	third phase, overthrow CCP?	15:37
6	on a couple of questions about representations. I	15:34	6	MR. GRENDI: Objection to form.	15:37
7	know we covered these much earlier today, but I want	15:34	7	MR. GAVENMAN: Objection to form.	15:37
8	to make sure I've got them.	15:34	8	THE WITNESS: I don't remember specifically.	15:37
9	A. Yeah.	15:34	9	We can go back and look at the timeline, but I don't	15:37
10	Q. Did Guo represent to Strategic Vision	15:34	10	remember.	15:37
11	that he was a dissident?	15:34	11	BY MR. GREIM:	15:37
12	MR. GAVENMAN: Objection, form.	15:34	12	Q. Did you observe the information that was	15:37
13	MR. GRENDI: Objection to form.	15:34	13	loaded onto hard drives given by Yvette Wang to	15:37
14	THE WITNESS: I don't think he specifically	15:34	14	French Wallop?	15:38
15	said he's a dissident, but I think he made his	15:35	15	MR. GAVENMAN: Objection to form.	15:38
16	intention clear to them that he's anti-CCP. This is	15:35	16	MR. GRENDI: Objection to form.	15:38
17	the agenda. The reason we're doing this is to	15:35	17	THE WITNESS: I think it might be -- Mike	15:38
18	disrupt the regime.	15:35	18	shoot me. I don't specifically remember. Maybe I	15:38
19	BY MR. GREIM:	15:35	19	recall that, but it's all junk, full of junk. I was	15:38
20	Q. And when you say disrupt the regime,	15:35	20	disappointed with that. I expressed my	15:38
21	what do you mean by that?	15:35	21	disappointment to Mike. It doesn't advance our	15:38
22	A. Just expose them to corruption, to the	15:35	22	agenda. It doesn't help the deliverables.	15:38
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1	scandals so that people will see the nature of the	15:35	1	Yes. I think I saw it.	15:38
2	Communist regime and even disturb internal power	15:35	2	BY MR. GREIM:	15:38
3	struggle among the leaders.	15:35	3	Q. I'm sorry. My question was different	15:38
4	Q. Did he say it was his goal to actually	15:35	4	though.	15:38
5	overthrow the Communist Part?	15:35	5	A. Okay. Sorry.	15:38
6	MR. GAVENMAN: Objection to form.	15:35	6	Q. My question was whether you saw the hard	15:38
7	MR. GRENDI: Objection to form.	15:35	7	drives that Yvette Wang gave to French Wallop with	15:38
8	THE WITNESS: That, I didn't remember	15:36	8	the initial information to begin the research?	15:38
9	specifically. I think Miles has been involved from	15:36	9	A. Oh, no. Maybe --	15:38
10	the original -- you know, the beginning of the 19 --	15:36	10	MR. GRENDI: Objection to the form.	15:38
11	2017 to this later stage.	15:36	11	MR. GAVENMAN: Objection to form.	15:38
12	Until now, there's an evolution going on with	15:36	12	THE WITNESS: Maybe French shoot me, but	15:38
13	him. He's political agenda are slight different in	15:36	13	French mentioned that when he installed, there some	15:38
14	each stage.	15:36	14	weird stuff going on.	15:39
15	BY MR. GREIM:	15:36	15	BY MR. GREIM:	15:39
16	Q. What do you mean by that?	15:36	16	Q. Did you -- do you remember hearing that	15:39
17	A. From the very beginning, you know, I	15:36	17	there was Malware in the drives?	15:39
18	think he is trying to protect his family, his	15:36	18	A. That's what French told me.	15:39
19	employees, and his assets, his own life, and revenge.	15:36	19	MR. GAVENMAN: Objection to form.	15:39
20	That's the goals, three goals, he proposed, and that	15:36	20	THE WITNESS: I have not -- yeah.	15:39
21	later evolved into anti-CCP, but still support CGP.	15:36	21	BY MR. GREIM:	15:39
22	Now he's moved along that line to overthrow the CCP	15:37	22	Q. Did you realize that that required	15:39
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1	MR. GRENDI: Objection to the form.	15:42	1	second week, but he wants to see you're able to get	15:44
2	THE WITNESS: Yes.	15:42	2	this information as you said.	15:44
3	BY MR. GREIM:	15:42	3	Q. Do you recall whether Mr. Guo had some	15:44
4	Q. Do you recall that Strategic Vision	15:42	4	event or some specific reason for wanting to have	15:45
5	reported to you that they had found Customs fraud?	15:42	5	information within the first couple of weeks?	15:45
6	MR. GRENDI: Objection to form.	15:42	6	MR. GRENDI: Objection to form.	15:45
7	MR. GAVENMAN: Objection to form.	15:42	7	MR. GAVENMAN: Objection to form.	15:45
8	THE WITNESS: Yes.	15:42	8	THE WITNESS: No. I think he wants to get,	15:45
9	BY MR. GREIM:	15:42	9	you know, his money's worth. I think also -- this is	15:45
10	Q. Do you recall that Strategic Vision	15:42	10	just my speculation, that he planned to have a global	15:45
11	reported to you that they had found possible human	15:42	11	press conference. I don't know if he's planning to	15:45
12	trafficking?	15:42	12	expose it, but he wants to get information so he will	15:45
13	MR. GAVENMAN: Objection to form.	15:42	13	be comfortable when he do this, you know, global	15:45
14	MR. GRENDI: Objection to form.	15:42	14	press release conference.	15:45
15	THE WITNESS: Yes.	15:42	15	BY MR. GREIM:	15:45
16	BY MR. GREIM:	15:42	16	Q. Did he disclose that conference to	15:45
17	Q. And did you report those facts to Mr.	15:42	17	Strategic Vision?	15:45
18	Guo?	15:42	18	MR. GAVENMAN: Objection to form.	15:45
19	A. Yes.	15:42	19	THE WITNESS: I don't know.	15:45
20	Q. What was his response?	15:42	20	MR. GRENDI: Objection to form.	15:45
21	A. He -- I forgot. I cannot recall exactly	15:42	21	THE WITNESS: Not in my presence. I don't	15:45
22	his reaction, but my impression now, I think he	15:43	22	recall that, I should say.	15:46
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1	didn't understand the significance of this	15:43	1	BY MR. GREIM:	15:46
2	information and he's so into whatever is in the	15:43	2	Q. Do you believe that -- or, well, let me	15:46
3	contract, you know, bank statements, how they --	15:43	3	-- I'll strike that. Did Mr. Guo ever end up getting	15:46
4	money transferred, that type of information. That's	15:43	4	research on these 15 individuals and using it for the	15:46
5	just my guess.	15:43	5	purposes that he claimed he would use it?	15:46
6	Q. So did Mr. Guo tell you that he believed	15:43	6	MR. GRENDI: Objection to the form.	15:46
7	that within the first week or two, he would be	15:43	7	MR. GAVENMAN: Objection.	15:46
8	getting actual bank statements for the subjects?	15:43	8	THE WITNESS: Please rephrase that.	15:46
9	A. Say that again.	15:43	9	BY MR. GREIM:	15:46
10	Q. Did Mr. Guo tell you that within the	15:43	10	Q. Sure. Did Mr. Guo ever end up getting	15:46
11	first week or two, he thought he would be getting	15:43	11	information on the 15 individuals and then using it	15:46
12	actual bank statements for the subjects?	15:44	12	for the purposes he claimed he was going to use	15:46
13	A. No. I think he wants to see whatever is	15:44	13	Strategic Vision's research?	15:46
14	in the contract, not just bank accounts. I'm just	15:44	14	MR. GRENDI: Objection to the form.	15:46
15	using that as an example.	15:44	15	MR. GAVENMAN: Objection.	15:46
16	Q. Sure.	15:44	16	THE WITNESS: That's a hypothetical question.	15:46
17	A. Because there are three or four	15:44	17	BY MR. GREIM:	15:46
18	different categories of information. He wants to	15:44	18	Q. Well, no. I wonder it if it actually	15:46
19	see, you know, the progress each time, each month,	15:44	19	happened?	15:46
20	each week that there is a progress on those type of	15:44	20	A. No. It never happened, because the	15:46
21	information. I don't think he expected to get, you	15:44	21	information is not what he's asking for.	15:47
22	know, like good intelligence in the first week or	15:44	22	Q. But did he ever go to somebody else --	15:47
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1	A. I don't know.	15:47	1	we still have many left. I mean here, the many left,	15:49
2	Q. -- and get the research and then go	15:47	2	but we didn't get anything.	15:49
3	expose Chinese Communist leaders?	15:47	3	Q. So when you said we have many left, it's	15:49
4	MR. GRENDI: Objection to form.	15:47	4	your testimony you're referring to people who are not	15:49
5	MR. GAVENMAN: Objection to form.	15:47	5	part of 15 whose names might have appeared?	15:49
6	THE WITNESS: I'm not aware of that.	15:47	6	A. No, no, no. If you read this, 82, page	15:49
7	BY MR. GREIM:	15:47	7	82, I said even there are five RP people, that means	15:49
8	Q. Do you recall Strategic Vision asking	15:47	8	people in this list that's under protection. There	15:49
9	you to ask Guo to provide some non-records-protected	15:47	9	are -- we still have many left. That means many in	15:49
10	names?	15:47	10	this list that left, we can go after them, but I said	15:49
11	MR. GRENDI: Objection to form.	15:47	11	we didn't get anything. I mean they didn't do	15:49
12	THE WITNESS: I don't know that. Say that	15:47	12	anything to collect that information. It put me in a	15:49
13	again. Non-record?	15:47	13	very difficult spot.	15:49
14	BY MR. GREIM:	15:47	14	More importantly, it failed to advance our	15:49
15	Q. Do you recall that Strategic Vision	15:47	15	agenda. So that's what said this project to do, to	15:50
16	asked you to ask Guo to provide some	15:47	16	get information to expose the corruption of Chinese	15:50
17	non-records-protected names?	15:47	17	Communist, you know, high-ranking officials.	15:50
18	MR. GRENDI: Objection to the form.	15:47	18	Q. I guess --	15:50
19	THE WITNESS: I don't remember, but there's	15:47	19	A. That's what I was upset about.	15:50
20	plenty in this list that is not protected.	15:47	20	Q. Right, but I guess my question to you is	15:50
21	BY MR. GREIM:	15:47	21	how do you know they were not gathering that	15:50
22	Q. Do you know that?	15:48	22	information?	15:50
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1	A. Yeah, because they told me they have	15:48	1	A. Because they told me they only found	15:50
2	four or five people that is under, you know, the	15:48	2	five or four. They are not sure how many actually	15:50
3	protection, but there's so many here. Even they said	15:48	3	are in this PR under protection, but if they only	15:50
4	15, but there's plenty, because Miles tried to stack	15:48	4	found two, I mean, or four or five, there's so many	15:50
5	more names into this research project.	15:48	5	here.	15:50
6	Q. So did you tell Strategic Vision that it	15:48	6	Q. Didn't they go and get information on	15:50
7	should just move on and start investigating other	15:48	7	someone named Frank Swen?	15:50
8	members of the family tree?	15:48	8	MR. GRENDI: Objection.	15:50
9	A. Yes. It's in here.	15:48	9	MR. GAVENMAN: Objection to form.	15:50
10	MR. GAVENMAN: Objection to form.	15:48	10	THE WITNESS: But that's not information in	15:50
11	THE WITNESS: I think in the texts made it	15:48	11	the contract. The information is only on surface,	15:50
12	very specific.	15:48	12	some kind of, you know, like use the, you know,	15:50
13	BY MR. GREIM:	15:48	13	Social Security account, maybe some passport issue.	15:50
14	Q. Let's see. Show me where you're	15:48	14	It's not the information. You know, they touched	15:51
15	pointing to.	15:48	15	some things, but not the information, you know, as	15:51
16	A. I don't remember, but it's in here.	15:48	16	specified.	15:51
17	Q. Okay. I would like to go -- because you	15:48	17	BY MR. GREIM:	15:51
18	pointed to your text. I would like to see where you	15:48	18	Q. Let me ask you this: Your text says and	15:51
19	provided that advice. It would have to be --	15:48	19	you've been saying today that only five are records	15:51
20	A. Okay. Let me see. Like, for example,	15:48	20	protected.	15:51
21	in 82, I discuss with French, said I'm disappointed	15:48	21	A. That's what they told me.	15:51
22	with the result. Ever there are five RP people, but	15:49	22	Q. That's -- well, I think you're reading	15:51
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1	MR. GRENDI: Objection to the form.	15:55	1	Q. We're getting too conversational, Mr.	15:57
2	MR. GAVENMAN: Objection.	15:55	2	Han.	15:57
3	THE WITNESS: I don't recall. I think I	15:55	3	A. Yeah.	15:57
4	probably heard from Mike and French, not from Miles.	15:55	4	Q. Let me ask you another question. Have	15:57
5	BY MR. GREIM:	15:56	5	you heard of Robert S. Tucker or Duncan Levin?	15:57
6	Q. When you heard that was happening, what	15:56	6	A. Yes.	15:57
7	did you do?	15:56	7	Q. Have you met them?	15:58
8	A. I don't remember. I was disappointed.	15:56	8	A. I met with Tucker.	15:58
9	I know that I put lots of hope in this project and I	15:56	9	Q. Okay. And was he a member of the	15:58
10	hoped its success. I feel I failed on both sides. I	15:56	10	security team for Guo?	15:58
11	tried to put two sides together, have Miles to pay	15:56	11	A. At the time.	15:58
12	for this, dig up something that we can use to expose	15:56	12	MR. GAVENMAN: Objection to form.	15:58
13	the Communist regime's corruption so that it advances	15:56	13	MR. GRENDI: Objection to form.	15:58
14	our agenda on anti-CCP, but I failed because I	15:56	14	BY MR. GREIM:	15:58
15	unforeseen the difficulties of finding this	15:56	15	Q. Was this in, what, 2017?	15:58
16	information and working together.	15:56	16	A. Yes.	15:58
17	So that's just my assessment.	15:56	17	Q. Do you know if Guo used Mr. Tucker to do	15:58
18	Q. But to be fair, you don't know of Mr.	15:56	18	this research?	15:58
19	Guo being able to do project like this with anyone	15:56	19	A. I didn't.	15:58
20	else, do you?	15:57	20	MR. GAVENMAN: Objection to the form.	15:58
21	MR. GRENDI: Objection.	15:57	21	BY MR. GREIM:	15:58
22	MR. GAVENMAN: Objection to form.	15:57	22	Q. Or research similar to this?	15:58
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1	THE WITNESS: Can you rephrase that?	15:57	1	A. I didn't.	15:58
2	BY MR. GREIM:	15:57	2	Q. Did there come a time when Tucker was no	15:58
3	Q. But to be fair, you don't of Mr. Guo	15:57	3	longer being used as the security person for Guo?	15:58
4	doing a project like this with anyone else, do you?	15:57	4	A. I didn't know when they terminate his	15:58
5	MR. GRENDI: Objection.	15:57	5	thing and I just later learned because they changed	15:58
6	MR. GAVENMAN: Objection to form.	15:57	6	security. I didn't ask why.	15:58
7	THE WITNESS: I don't know if he's doing	15:57	7	Q. Do you know anything about what Mr.	15:58
8	anything or have done anything with other group	15:57	8	Tucker did for Mr. Guo?	15:58
9	whatsoever except this one.	15:57	9	A. I didn't.	15:58
10	BY MR. GREIM:	15:57	10	MR. GRENDI: Objection.	15:58
11	Q. On that point, have you ever heard of	15:57	11	MR. GAVENMAN: Objection.	15:58
12	T&M -- that's the letter T and M --Protection	15:57	12	THE WITNESS: Except one thing.	15:58
13	Resources?	15:57	13	MR. GAVENMAN: You can answer.	15:58
14	A. No. Can you -- who -- is that his	15:57	14	THE WITNESS: I can answer? Okay. Except	15:58
15	security team?	15:57	15	one thing. I had a breakfast with Tucker and he told	15:59
16	Q. At one time, I believe.	15:57	16	me that during the breakfast that one of his	15:59
17	MR. GRENDI: Objection. I mean, who's	15:57	17	Communist -- we suspect a Communist agent approached	15:59
18	testifying? Sorry.	15:57	18	him. We suspect this guy is the smear campaign	15:59
19	MR. GREIM: Yeah. That's right. Let's keep	15:57	19	commander in this country. We know he's very close	15:59
20	it Q&A. I'm sorry.	15:57	20	to CCP, high ranking, and this guy, his name is Bruno	15:59
21	MR. GRENDI: Thanks.	15:57	21	Wu.	15:59
22	BY MR. GREIM:	15:57	22	Bruno Wu approached Tucker, offered him 20	15:59
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1	million cash to switch to espionage on Miles, and	15:59	1	answered.	16:20
2	Tucker asked where you get the cash and he said from	15:59	2	THE WITNESS: I don't remember I saw that.	16:20
3	Jack Ma, Alibaba, and then he said they had this	16:00	3	BY MR. GREIM:	16:20
4	conversation in the open. He videotaped the	16:00	4	Q. Okay. Would you have introduced	16:20
5	conversation.	16:00	5	Strategic Vision to the Japan and Taiwan projects if	16:20
6	BY MR. GREIM:	16:00	6	you thought that Strategic Vision was dishonest?	16:20
7	Q. Tucker did?	16:00	7	MR. GAVENMAN: Objection to form.	16:20
8	A. Tucker did. That's the only thing I	16:00	8	MR. GRENDI: Objection.	16:20
9	remember during the conversation I had with him.	16:00	9	THE WITNESS: I wouldn't.	16:20
10	MR. GREIM: All right. Okay. Let's take a	16:00	10	BY MR. GREIM:	16:20
11	short break.	16:00	11	Q. Okay. Let's see. I didn't ask you this	16:20
12	MR. GRENDI: Yeah.	16:00	12	before: Have you ever met Karin Maestrello?	16:20
13	VIDEOGRAPHER: Going off the record. The	16:00	13	A. Who is that?	16:20
14	time is 4:02 p.m.	16:00	14	Q. Okay. Then I guess -- have you heard	16:20
15	[Recess.]	16:00	15	that name before?	16:21
16	VIDEOGRAPHER: We are back on the record.	16:18	16	A. Carol?	16:21
17	The time is now 4:20 p.m.	16:18	17	Q. Karin Maestrello.	16:21
18	BY MR. GREIM:	16:19	18	A. Karin? Karin? You mean Miles'	16:21
19	Q. Mr. Han, you testified earlier that the	16:19	19	assistant, Karin?	16:21
20	projects being discussed at the end of the packet	16:19	20	Q. Yes.	16:21
21	we've marked as Exhibit 10, that those projects did	16:19	21	A. Yes. I met. The Italian girl?	16:21
22	not come to fruition?	16:19	22	Q. The what?	16:21
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1	MR. GAVENMAN: Objection.	16:19	1	A. Italian girl.	16:21
2	THE WITNESS: With --	16:19	2	Q. Italian girl, that's right.	16:21
3	BY MR. GREIM:	16:19	3	A. Yes. I met her.	16:21
4	Q. With Strategic Vision?	16:19	4	Q. Do you know what she does for Mr. Guo?	16:21
5	A. No.	16:19	5	A. She's just --	16:21
6	Q. And did that include the Taiwan project?	16:19	6	MR. GAVENMAN: Objection to form.	16:21
7	A. Correct. We are still waiting for that	16:19	7	MR. GRENDI: Objection to form.	16:21
8	response.	16:19	8	THE WITNESS: My understanding is like an	16:21
9	Q. Do you recall the contact in Taiwan	16:19	9	assistant, office assistant.	16:21
10	citing the political article as a concern in working	16:19	10	BY MR. GREIM:	16:21
11	with Strategic Vision?	16:19	11	Q. Do you recall that -- do you recall	16:21
12	A. No. What's that? Can you remind me?	16:19	12	hearing that Mr. Guo, himself, told Ms. Wallop and	16:21
13	Q. Well, are you aware of an article in	16:19	13	Mr. Waller that Yvette Wang was still a member of the	16:21
14	"Politico" about -- written about Eastern Profit and	16:19	14	Chinese Communist Party?	16:22
15	Strategic Vision in this case?	16:19	15	A. No. I don't recall that.	16:22
16	A. I saw that article, but that has nothing	16:19	16	Q. Do you recall telling Ms. Wallop and Mr.	16:22
17	to do with the Taiwan project.	16:20	17	Waller that Yvette Wang was still a member of the	16:22
18	Q. Oh. I understand. It doesn't discuss	16:20	18	Chinese Communist Party?	16:22
19	the Taiwan project at all, but do you recall that the	16:20	19	A. I don't. I don't recall that.	16:22
20	contact in the Taiwan project mentioned the	16:20	20	Q. Do you think it's possible and just	16:22
21	"Politico" article?	16:20	21	don't remember?	16:22
22	MR. GAVENMAN: Objection, form, asked and	16:20	22	A. I think it's possible.	16:22
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1	matter?	16:35	1	-- I'll call them fake dissidents, people are	16:37
2	MR. GREIM: Objection, calls for speculation	16:35	2	pretending to be dissidents?	16:37
3	and opinion and also vague.	16:35	3	A. Yes.	16:37
4	THE WITNESS: I think they have a good	16:35	4	Q. And what do those fake dissidents do?	16:37
5	intention at the beginning and want to do the right	16:35	5	What is their purpose?	16:37
6	thing, and yeah. I have no doubt, otherwise, I	16:35	6	A. If we're talking about specifically	16:37
7	wouldn't introduce them to Miles.	16:35	7	related to this project --	16:37
8	BY MR. GRENDI:	16:35	8	Q. Sure.	16:37
9	Q. Do you think they cared about the money?	16:35	9	A. They're a smear campaign against Miles	16:37
10	A. They do care about the money, but they	16:35	10	Kwok. That was number one that those fake dissidents	16:37
11	do also care about the political agenda.	16:35	11	are doing, and in addition to that, there are a lot	16:38
12	Q. What is Hansheng Wang look like?	16:35	12	of people that Miles sued or countersued who are	16:38
13	A. He's a very quiet guy, very reserved,	16:35	13	involved in fake political asylum business and they	16:38
14	never participated in any of our meetings.	16:35	14	are to survive to make money, like fake persons.	16:38
15	Q. Have you ever talked to him?	16:35	15	We have evidence to show they made -- he	16:38
16	A. Occasionally.	16:35	16	helped people to fabricate fake political asylum	16:38
17	Q. If you recall, what did you talk to him	16:35	17	cases, and there are many more. Like another guy, a	16:38
18	about?	16:36	18	lawyer, also does the same thing and then he's also	16:38
19	A. I think it's like what he -- where he	16:36	19	somehow connected with the MSS and the Chinese	16:38
20	come from, where's his native province and what the	16:36	20	Embassy.	16:38
21	family were doing. I think he just come from a poor	16:36	21	There are so many of them. You know, I think	16:38
22	family, like a rural farmer, stuff like that.	16:36	22	you probably need to talk to the FBI to get this	16:38
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1	Q. How many times have you met him?	16:36	1	information.	16:39
2	A. I don't know. I don't remember exactly	16:36	2	Q. So you believe the CCP is employing	16:39
3	how many times, but every time I've been to the	16:36	3	hundreds of fake dissidents, if you know, however	16:39
4	apartment, most of the time he's there.	16:36	4	many you think?	16:39
5	Q. Is he a dissident?	16:36	5	A. I don't know how many. I have no idea	16:39
6	MR. GREIM: Objection, calls for opinion.	16:36	6	how many, but in this particular case against Miles,	16:39
7	THE WITNESS: Well, no. I think he is part	16:36	7	they hired very many to do their dirty work,	16:39
8	of, you know, Miles' team. You know, you can't	16:36	8	basically drag them into this lawsuit. At the	16:39
9	escape that. Everybody becomes a dissident now.	16:36	9	beginning, I think lots of dissidents, whether fake	16:39
10	BY MR GRENDI:	16:37	10	or real, they come to Miles and try to get support,	16:39
11	Q. Anyone who does business with Miles	16:37	11	financial support, from him, and when that failed and	16:39
12	and --	16:37	12	they started fighting over social media, criticized	16:39
13	A. Anyone associated with him, does	16:37	13	Miles, and that caused them anger from Miles' side.	16:39
14	business with him, they will all become a dissident.	16:37	14	So he started suing them, and those dissidents or	16:40
15	Q. And they're putting their lives at risk	16:37	15	activists, so called, they have now resources to do	16:40
16	if they go back to China by doing so?	16:37	16	this and then we saw the money transfer from the	16:40
17	MR. GREIM: Objection, calls for speculation.	16:37	17	Chinese Government. They use one singular law firm	16:40
18	THE WITNESS: Absolutely.	16:37	18	to do -- you know, didn't bother to change their	16:40
19	BY MR. GREIM:	16:37	19	complaints, and then we have some evidence	16:40
20	Q. I'm sorry. What was your --	16:37	20	independently -- it has nothing to do with Miles --	16:40
21	A. Absolutely.	16:37	21	we obtained from people that we know, showing that	16:40
22	Q. Okay. Do you know if the CCP employees	16:37	22	they work closely with the Chinese consulate in New	16:40
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1	York, the embassy here, and money their transferred	16:40	1	Q. Do they ever post fake images?	16:43
2	from different channels to pay for the legal bill.	16:40	2	A. Could be.	16:43
3	Q. Are you familiar with a website called	16:40	3	Q. Fake videos?	16:43
4	Boxun, B-O-X-U-N, I think?	16:41	4	A. That, I'm not expert on that. So I	16:43
5	A. Yes.	16:41	5	can't tell.	16:43
6	Q. And what does that website do?	16:41	6	Q. Would it surprise you if they did?	16:43
7	A. That website used to be a dissident	16:41	7	A. No. I'm not surprised by that.	16:43
8	Chinese language dissident -- you know, it's like a	16:41	8	Q. Are you aware that Google recently took	16:43
9	free press. It's a free platform. Everybody can put	16:41	9	down a number of videos from its platform that were	16:43
10	their stuff in there, but mostly, it's the dissidents	16:41	10	posted by fake dissidents?	16:43
11	who use that website to access information, post	16:41	11	A. Yes.	16:43
12	their grievances or the articles they wrote.	16:41	12	Q. Do you know if any of those videos were	16:43
13	Q. So it's sort of open source; anyone can	16:41	13	critical of Miles Kwok or Guo Wengui?	16:43
14	post on it?	16:41	14	A. I don't know specific. I suspect, yeah.	16:43
15	A. Correct.	16:41	15	There might be some.	16:43
16	Q. Have fake dissidents posted information	16:41	16	Q. Because Guo Wengui is a real dissident.	16:43
17	on that website?	16:41	17	Right?	16:43
18	A. I'm sure there are many Chinese	16:41	18	A. Guo Wengui, yes. I would characterize	16:43
19	Communists, you know, like sui jin. The water army,	16:41	19	him as a real dissident.	16:44
20	that's the term that posts stuff on that website as	16:41	20	Q. And the CCP pretty desperate to get him	16:44
21	well.	16:41	21	back to China and put him in jail?	16:44
22	Q. So you wouldn't necessarily trust	16:41	22	A. Correct.	16:44
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1	anything coming out of Boxun because fake dissidents	16:41	1	Q. In drafting the contract, was there a	16:44
2	post information there?	16:42	2	concern about Mr. Wengui being identified in	16:44
3	A. No. It depends on the information.	16:42	3	connection with the research agreement?	16:44
4	Q. Do you happen know where Exhibit 3 and	16:42	4	A. I think there was, if I recall	16:44
5	Exhibit 3 were posted, where they came from?	16:42	5	correctly.	16:44
6	A. No, I don't. Which one?	16:42	6	Q. I'll take you back to the contract. Do	16:44
7	Q. Three.	16:42	7	you remember if there was a specific schedule in that	16:44
8	A. Okay. Yeah.	16:42	8	agreement concerning when reports were to be	16:44
9	Q. Do you know if Boxun was the uploading	16:42	9	delivered?	16:44
10	entity that put this video out there?	16:42	10	A. Yes. There is.	16:44
11	A. I didn't know that.	16:42	11	Q. Was it -- did it call for reports within	16:44
12	Q. Would you trust it if it came from	16:42	12	the first week, in the first month of the contract?	16:45
13	Boxun?	16:42	13	A. Yeah. I think there is a specific	16:45
14	A. It depends on the content. I think it	16:42	14	requirement on the first week. I think it's just	16:45
15	depends on the information.	16:42	15	trying to show the progress, we're on the right	16:45
16	Q. Well, let me ask you this.	16:42	16	track.	16:45
17	A. Not necessarily whether it showed on the	16:42	17	Q. Well, let's look at the agreement. What	16:45
18	platform.	16:42	18	number is that? It's number --	16:45
19	Q. Have fake dissidents posted false	16:42	19	MR. GAVENMAN: Eleven.	16:45
20	information about other dissidents to disrupt the --	16:42	20	MR. GRENDI: Eleven.	16:45
21	I'll call it the effort to damage the CCP?	16:42	21	MR. GREIM: Let me just say while we're	16:45
22	A. Yeah. There are some.	16:42	22	pulling it up, the witness was instructed not to	16:45
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1	answer previously about the agreement on the ground	16:45	1	reports per individual subject to the client within a	16:47
2	it was calling for a legal conclusion. So I would	16:45	2	specified timeframe as well as all relevant	16:47
3	hope we'd have consistence.	16:45	3	supporting data."	16:47
4	MR. GAVENMAN: It depends on what the	16:45	4	Do you see that?	16:47
5	question is.	16:45	5	A. Yes.	16:47
6	MR. GRENDI: I wasn't asking about a legal	16:45	6	Q. I'll ask you again did Strategic Vision	16:47
7	opinion on it.	16:45	7	deliver weekly reports within the first month of the	16:47
8	Oh, there's my copy. I'm sorry.	16:45	8	agreement?	16:47
9	BY MR. GRENDI:	16:45	9	A. No.	16:47
10	Q. Just looking at the second page, it says	16:45	10	Q. If you look further down the page, it	16:47
11	the contractor will produce progress reports on this	16:46	11	says: "The contractor will produce social media	16:47
12	--	16:46	12	research per individual subject to the client on a	16:47
13	A. Where is that?	16:46	13	weekly basis for the first month and on a monthly	16:47
14	Q. Oh, I'm sorry. The first full paragraph	16:46	14	basis thereafter except under circumstances that	16:47
15	on the second page.	16:46	15	require more frequent reporting, paren, weekly or	16:47
16	A. Okay. Okay. Yes.	16:46	16	fortnightly, as the client directs or irregular	16:48
17	Q. It says: "The contractor will produce a	16:46	17	emergencies that the contractor may discover."	16:48
18	progress report on this financial forensic research	16:46	18	Do you see that?	16:48
19	each week in the first month, one preliminary report	16:46	19	A. Um-hum.	16:48
20	in the first month and one comprehensive historical	16:46	20	Q. Did Strategic Vision deliver weekly	16:48
21	research report within three months."	16:46	21	reports during the first month of the agreement	16:48
22	And then it goes on to talk about update	16:46	22	concerning social media research?	16:48
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1	reports. Do you see that section there?	16:46	1	MR. GREIM: Objection, foundation.	16:48
2	A. Yes.	16:46	2	THE WITNESS: No.	16:48
3	Q. Did Strategic Vision deliver financial	16:46	3	BY MR. GRENDI:	16:48
4	forensic research reports each week in the first	16:46	4	Q. And if you look in the middle of the	16:48
5	month?	16:46	5	page there, again, we're on Eastern-000006, the	16:48
6	MR. GREIM: Objection. Counsel has not	16:46	6	middle paragraph says: "The contractor will produce	16:48
7	actually read the portion of the contract that he's	16:46	7	concurrent tracking research per individual subject	16:48
8	purporting to ask about.	16:46	8	to the client on a month basis except in the first	16:48
9	MR. GRENDI: What are you talking about?	16:46	9	month that weekly reports shall be delivered and	16:48
10	THE WITNESS: No.	16:46	10	under circumstances that require more frequent	16:48
11	MR. GRENDI: Would you like me to read the	16:46	11	reporting, paren, weekly or fortnightly, end paren,	16:48
12	full sentence, Mr. Greim? Is that what you're	16:46	12	as the client directs up to a six-month period."	16:48
13	getting at?	16:46	13	Do you see that?	16:48
14	BY MR. GRENDI:	16:46	14	A. Yes.	16:48
15	Q. Let me try it again. Looking at this	16:46	15	Q. Did Strategic Vision deliver weekly	16:49
16	first full paragraph on the second page, it says:	16:46	16	reports on tracking research per individual subject	16:49
17	"The contractor will produce a progress report on	16:46	17	during the first month of the agreement?	16:49
18	this financial forensic research each week in the	16:47	18	A. No.	16:49
19	first month, one preliminary report in the first	16:47	19	Q. Okay. Did there come a time when	16:49
20	month, and one comprehensive historical research	16:47	20	Strategic Vision delivered a 60-gigabyte hard drive	16:49
21	report within three months and with update reports	16:47	21	of data to Eastern Profit?	16:49
22	sin each following month. The client may require	16:47	22	A. Yes.	16:49
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1	Q. And what was on that hard drive?	16:49	1	A. Is this relevant?	16:51
2	A. It's lots of junk information.	16:49	2	Q. Well, that's what I'm going to get at	16:51
3	Q. Was any of that information the kind of	16:49	3	here, because my understanding would probably be that	16:51
4	useful reporting that Eastern Profit would have	16:49	4	you don't want to reveal the name of that entity.	16:51
5	expected under this agreement?	16:49	5	A. No.	16:52
6	MR. GREIM: Objection, foundation, calls for	16:49	6	Q. Okay. Is that because it's normally	16:52
7	opinion.	16:49	7	confidential; you don't disclose the dealings of	16:52
8	THE WITNESS: No.	16:49	8	private investigatory research clients that you're	16:52
9	BY MR. GRENDI:	16:49	9	working with with Strategic Vision?	16:52
10	Q. Okay. I believe you testified before	16:49	10	A. Correct.	16:52
11	that you had heard that Team 2 found evidence of --	16:50	11	MR. GRENDI: So, Attorney Greim, we can talk	16:52
12	strike that.	16:50	12	about whether you're going to try to use that in	16:52
13	Did you ever hear that Team 2 of Strategic	16:50	13	damages and we can talk about who this client is and	16:52
14	Vision's team found evidence of Social Security	16:50	14	find out information about it or you can -- we can	16:52
15	number fraud or human trafficking or customs fraud?	16:50	15	lay off on that and maybe talk to your client about	16:52
16	A. Say that again.	16:50	16	it.	16:52
17	Q. Sorry. Did there ever come a time when	16:50	17	MR. GREIM: Yeah. Let's just -- let's take	16:52
18	you heard from Strategic Vision that its second team	16:50	18	one minute.	16:52
19	-- they call it Team 2 -- had found evidence of	16:50	19	MR. GRENDI: Sure. Off the record.	16:52
20	Social Security fraud, human trafficking, or customs	16:50	20	VIDEOGRAPHER: Going off the record. The	16:52
21	fraud concerning the subjects of the research	16:50	21	time is now 4:54 p.m.	16:52
22	agreement?	16:50	22	[Mr. Greim confers with Ms. Wallop and Mr.	16:52
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1	A. Yes, but I don't hear the Team 2, that	16:50	1	Waller.]	16:54
2	term. I was not familiar with the Team 2.	16:50	2	VIDEOGRAPHER: We are back on the record.	16:54
3	Q. Let's just say Strategic Vision. Did	16:51	3	The time is now 4:57 p.m.	16:55
4	Strategic Vision tell you it had found that kind of	16:51	4	BY MR. GRENDI:	16:55
5	information?	16:51	5	Q. So, Mr. Han, if you would please	16:55
6	A. Yes.	16:51	6	identify the client or potential client from Taiwan	16:55
7	Q. They did ever give you any documents to	16:51	7	that you spoke of politically concerning a newspaper	16:55
8	prove that or show that that was the case?	16:51	8	article in "Politico".	16:55
9	A. No.	16:51	9	A. There is a -- I saw that article. I	16:55
10	Q. No. Okay. And the whole point of this	16:51	10	didn't know what it referred to. They specifically	16:55
11	agreement was to get that, like you said, the	16:51	11	talked about the Taiwan project?	16:55
12	concrete evidence that there was corruption in the	16:51	12	Q. No, no. I'm sorry. You know what?	16:55
13	CCP. Right?	16:51	13	Let's strike that question. I'll start over.	16:55
14	A. Correct.	16:51	14	what is the name of the entity you and	16:55
15	Q. But that was never delivered under this	16:51	15	Strategic Vision have been working on that comes from	16:55
16	agreement, was it?	16:51	16	Taiwan? Who is that?	16:55
17	A. No.	16:51	17	A. There are several. The Taiwan National	16:55
18	Q. I'll ask about this one, but I think	16:51	18	Security Council and Taiwan DPP, which is the ruling	16:55
19	we're going to have to eventually go off the record	16:51	19	party, and the embassy here.	16:55
20	on it. What is the name of project in Taiwan that	16:51	20	Q. And is Strategic Vision trying to	16:55
21	you were talking about with Attorney Greim just	16:51	21	solicit business from those entities?	16:55
22	before the break?	16:51	22	A. Correct.	16:56
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